

RCRA CHECKLIST FOR INSPECTION OF USED OIL FUEL MARKETERS/PROCESSORS

Name of Facility: Hukill Chemical Corporation
 Address: 7013 Krick Road
 Bedford, OH 44146
 EPA I.D. Number: OHD 001926740
 Facility Inspection Representative: Edgar Price
 Title: Chemical Operations Consultant
 Telephone: (216) 232-9400

(Specify NA if questions do not apply).

Applicability

Regulations of 40 CFR Part 266, Subpart E, apply to used oil burned for energy recovery in boilers or industrial furnaces. Used oil includes any fuel produced from used oil by processing, blending, or other treatment. (§266.40(a))

	Yes	No	Comments:
1. Does the facility accept hazardous waste?	<u>X</u>	___	<u>See (1)*</u>
If so, does the facility accept only characteristic hazardous waste? (list codes)(266.40(d))	___	<u>X</u>	<u>See Exhibits 1 and 2</u>
2. Does the used oil contain > 1000 ppm of total halogens? If so, it is presumed to have been mixed with listed halogenated hazardous waste. (266.40(c))	<u>X</u>	___	<u>See (1)</u>
3. Does the facility only accept used oil?	___	<u>X</u>	___
List generators or other sources:			___ ___
4. Are other materials recycled for energy recovery?	___NA___	___	___

*Comments are listed numerically on pages 8 and 9

5. Check the following applicable operating practices (for used oil fuel): NA

<u>Storage</u>	<u>Treatment</u>	<u>Disposal</u>
<input type="checkbox"/> Drum	<input type="checkbox"/> Settling	<input type="checkbox"/> Landfill
<input type="checkbox"/> Above ground tank(s)	<input type="checkbox"/> Heat addition	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Underground tank(s)	<input type="checkbox"/> In-Line Filtering	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Other	<input type="checkbox"/> Centrifugation	
<input type="checkbox"/> Tank sizes	<input type="checkbox"/> Screen Filtration (basket)	<input type="checkbox"/> Other
_____	<input type="checkbox"/> Dehydration	
_____	<input type="checkbox"/> Emulsion Breaking	
	<input type="checkbox"/> Blending	

Descriptions and Observations: Used oil fuel is occasionally received and blended into
hazardous waste fuel (Chemfuel). Used oil fuel is not stored separately -- see (1), (4).

	Yes	No	Comments:
6. Has the facility notified the U.S. EPA of its waste as fuel activities by January 29, 1986? (§266.43(b))	<u>X</u>	<input type="checkbox"/>	<u>See (2) and Exhibit 1</u>
Specify Notification Information: <u>Notification of</u> <u>Hazardous Waste Activity dated 1/27/86</u>			
7. Has the facility submitted a Part A application for storage of hazardous waste?	<u>X</u>	<input type="checkbox"/>	<u>See (2) and Exhibit 2</u>
Specify Part A information: <u>Dated 9/30/82</u>			
8. Does the facility generate hazardous waste? If so, refer to generator checklist.	<u>X</u>	<input type="checkbox"/>	_____
9. Does the facility have manifests for all shipments of hazardous waste received and sent? (§265.70)	<u>X</u>	<input type="checkbox"/>	<u>See Exhibit 4</u>
10. Does the facility market only to burners or other marketers who have notified U.S. EPA? (§266.43(b)(2))	<u>X</u>	<input type="checkbox"/>	<u>See Exhibit 5</u>
11. Does the facility have copies of required notices from burners and other marketers, received and sent? (§266.43(b)(5))	<u>X</u>	<input type="checkbox"/>	<u>See Exhibit 5</u>

	Yes	No	Comments:
12. Do invoices contain the following information? (§266.43(b)(4))			
(i) An invoice number	<u>Unknown</u>		<u>See (5)</u>
(ii) Marketer's EPA ID number and Receiver's EPA ID Number	<u>Unknown</u>		
(iii) Names and addresses of shipping and receiving facilities	<u>Unknown</u>		
(iv) Quantity of off-specification fuel being delivered	<u>Unknown</u>		
(v) Date of shipment or delivery	<u>Unknown</u>		
(vi) Statement - "This used oil is subject to EPA regulation under 40 CFR Part 266"	<u>Unknown</u>		
13. Does the facility have copies of invoices received and sent for the past three years? (§266.43(b)(6))	<u>X</u>		<u>See (5)</u>
14. Does the facility first claim the used oil meets the specifications? If so,		<u>X</u>	
14a. Does the facility have records of analyses or other information used to claim the used oil meets the specifications? (§266.43(b)(1))	<u>NA</u>		
14b. Does the facility have a record or operating log specifying, for each shipment: (§266.43(b)(6)(i))			
A. Name and address of receiving facility;	<u>Unknown</u>		<u>See (5)</u>
B. Quantity of used oil fuel delivered;	<u>Unknown</u>		
C. Date of delivery or shipment;	<u>Unknown</u>		
D. Cross-reference to records of used oil analyses or other information?	<u>Unknown</u>		

Inspector's Name: Jean Michaels and Ron Baker (PRC EMI)

Title: Contracted RCRA Compliance Inspectors (EPA Contract No. 68-W9-0006, TES 9)

Agency: U.S. EPA

Office Location: Chicago, IL

Date of Inspection: 8/29/89

Comments: For comments 1 and 2, see pages 8 and 9.

RCRA CHECKLIST FOR INSPECTION OF HAZARDOUS WASTE FUEL MARKETERS/PROCESSORS

Name of Facility: Hukill Chemical Corporation
 Address: 7013 Krick Road
 Bedford, OH 44146
 EPA Waste Fuel I.D. Number: OHD 001926740
 Facility Inspection Representative: Edgar Price
 Title: Chemical Operations Consultant
 Telephone: (216) 232-9400

(Specify NA if questions do not apply).

Site Characterization:	Yes	No	Comments:
1. Does the facility accept hazardous waste?	<u>X</u>	___	<u>See (1)</u>
2. Does the facility blend hazardous waste with used oil to be marketed as fuel?	___	<u>X</u>	___
3. Does the facility accept hazardous waste fuel, i.e., used oil previously blended with hazardous waste?	<u>X</u>	___	<u>See (1)</u>
4. Does the facility only accept characteristic hazardous waste?	<u>X</u>	___	___
Used oil burned for energy recovery that is hazardous solely because it exhibits a characteristic of hazardous waste is subject to regulations under Subpart E rather than Subpart D. Refer to the Used Oil Fuel Marketer Checklist. (§266.30(b)(1))			
5. Does the facility only accept non-hazardous used oil? If so, refer to the Used Oil Fuel Marketer Checklist.	___	<u>X</u>	___
6. Does the facility generate hazardous waste? If so, refer to generator checklist.	<u>X</u>	___	<u>See (3)</u>
7. Does the facility accept only used oil?	___	<u>X</u>	___
8. Specify other material recycled as fuel.	_____		

9. Check the following general operating practices (for hazardous waste):

<u>Storage</u>	<u>Treatment</u>	<u>Disposal</u>
<u>X</u> Drum	<u>X</u> Settling	<u> </u> Landfill
<u>X</u> Aboveground tank(s)	<u>X</u> Heat addition/distillation	<u> </u> Land Treatment
<u> </u> Underground tank(s)	<u> </u> In-Line Filtering	<u> </u> Surface Impoundment
<u> </u> Other	<u> </u> Centrifugation	
<u> </u> Tank sizes	<u> </u> Screen Filtration (basket)	<u> </u> Other
<u>See Exhibit 3 and Exhibit 6</u> <u>(on-site photographs)</u>	<u> </u> Dehydration	
	<u> </u> Emulsion Breaking	
	<u>X</u> Blending	

Descriptions and Observations: See (4)

	Yes	No	Comments:
10. Has the facility notified the U.S. EPA of its waste as fuel activities by January 29, 1986? (§266.34(b))	<u>X</u>	<u> </u>	<u>See (2) and Exhibit 1</u>
Specify Notification Information: <u>Notification of</u> <u>Hazardous Waste Activity dated 1/27/86</u>			
11. Has the facility submitted a Part A application for storage of hazardous waste by May 29, 1986? (§266.34(c))	<u>X</u>	<u> </u>	<u>See (2) and Exhibit 2</u>
Specify Part A information: <u>Dated 9/30/82</u>			
12. Does the facility accept hazardous waste? Specify waste and generator type. (Request manifests for review)	<u>X</u>	<u> </u>	<u> </u>
<u>X</u> Small Quantity Generators (<u>X</u> <100kg/m or <u>X</u> 100 ≤1000 kg/m)			
<u>X</u> Large Quantity Generators			
Specify waste types: <u>All F-wastes, D001, D002,</u> <u>D008, K086</u>			

	Yes	No	Comments:
13. Does the facility have manifests for all shipments of hazardous waste and blended hazardous waste fuel received and sent? (§265.70)	<u>X</u>	___	<u>See Exhibit 4</u>
14. Does the facility comply with the prohibitions of §266.31(a)? (Review operating records, certifications from burners and invoices. If available, obtain a customer list from the facility.)	<u>X</u>	___	<u>Complete Customer list not available. See Exhibit 5</u>
15. Does the facility have a copy of the <u>required notice</u> from burners or marketers to whom waste fuel is marketed? (§266.34(e))	<u>X</u>	___	<u>See Exhibit 5</u>
16. Does the facility have invoice information or an operating record for shipments of used oil claimed to be specification used oil fuel? (§266.43(b)(6))	<u>NA</u>	___	___
17. Does the facility analyze for metals, total halogens, and flash point? (§266.43(b)(1))	<u>NA</u>	___	___
Specify methods: _____			
18. Does the facility have the records required under §266.34(f), i.e., copies of certifications from burners and other marketers?	<u>X</u>	___	___

*but not sufficient
OOW 11/6/90*

Note: If a facility markets hazardous waste fuel, the facility is subject to storage requirements of Parts 262, 264, or 265, and 270, Subparts A through L. Therefore, the RCRA checklist for inspection of TSD facilities may be useful.

Inspectors's Name: Jean Michaels and Ron Baker (PRC EMI)

Title: Contracted RCRA Compliance Inspectors (EPA Contract No. 68-W9-0006, TES 9)

Agency: U.S. EPA

Office Location: Chicago, IL

Date of Inspection: 8/29/89

Comments:

- (1) Hukill Chemical Corporation (HCC) is a distributing and recycling company. HCC distributes prepared chemicals for larger chemical companies, though some blending is done on-site. HCC also recycles and blends waste solvents. The recycled solvents are sold, usually back to the original generator. The still bottoms are processed to be used in "Chemfuel." Chemfuel is HCC's hazardous waste fuel made from blending still bottoms

and non-recyclable liquids. HCC rarely accepts used oil fuel and hazardous waste fuel for blending (in Chemfuel).

- (2) HCC notified the U.S. EPA of its hazardous waste activity on January 27, 1986 (See Exhibit 1). HCC notified as a processor of hazardous waste fuel and used oil fuel. HCC did not notify as a burner of hazardous waste fuel or used oil fuel. Therefore, the RCRA Checklist for Burners of Used Oil Fuel and Hazardous Waste Fuel was not completed. HCC submitted a RCRA Part A permit application on September 30, 1982 (See Exhibit 2).
- (3) HCC accepts spent hydrofluoric and sulfuric acids. The acids are reconcentrated and shipped back to the generator. Residual contaminated water is shipped as hazardous waste to a TSD facility for treatment.
- (4) HCC's aboveground tank farm is contained by a 3- to 4-foot berm treated with a chemical resistant coating (see Exhibit 3). The drum storage area is located in an enclosed explosion-proof warehouse.
- (5) HCC initiates invoices (Exhibit 4) to track and maintain cost accounting of hazardous waste shipments. Because these invoices are for hazardous waste shipments, 266.43 (b)(6), which pertains to waste oil fuel recordkeeping, does not apply. On the otherhand, Mr. Price stated that invoices associated with waste oil shipments are maintained in accordance with 266.43(b)(6)(ii). However, HCC was unable to provide PRC with a copy of a used oil invoice.

EXHIBIT 1
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
DATED JANUARY 27, 1986

OHD 001926740

United States Environmental Protection Agency
Washington, DC 20460

Notification of Hazardous Waste Activity

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments											
C											
C											
Installation's EPA ID Number								Approved		Date Received (yr. mo. day)	
C								T/A	C		
F									1		

I. Name of Installation

H U K I L L C H E M I C A L C O R P O R A T I O N

II. Installation Mailing Address

Street or P.O. Box																			
C																			
3	7	0	1	3	K	R	I	C	K	R	O	A	D						
City or Town												State	ZIP Code						
C																			
4	B	E	D	F	O	R	D						O	H	4	4	1	4	6

III. Location of Installation

Street or Route Number																			
C																			
5	7	0	1	3	K	R	I	C	K	R	O	A	D						
City or Town												State	ZIP Code						
C																			
6	B	E	D	F	O	R	D						O	H	4	4	1	4	6

IV. Installation Contact

Name and Title (last, first, and job title)												Phone Number (area code and number)															
C																											
2	H	U	K	I	L	L	R	O	B	E	R	T	P	R	E	S	.	2	1	6	2	3	2	9	4	0	0

V. Ownership

A. Name of Installation's Legal Owner												B. Type of Ownership (enter code)								
C																				
R	H	U	K	I	L	L	C	H	E	M	I	C	A	L	C	O	R	P	P	

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities	
<input checked="" type="checkbox"/> 1a. Generator	<input type="checkbox"/> 1b. Less than 1,000 kg/mo.	<input checked="" type="checkbox"/> 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)	RECEIVED FEB 18 1986 PROCESSED REGION V
<input checked="" type="checkbox"/> 2. Transporter		<input type="checkbox"/> a. Generator Marketing to Burner	
<input checked="" type="checkbox"/> 3. Treater/Storer/Disposer		<input checked="" type="checkbox"/> b. Other Marketer Processor	
<input type="checkbox"/> 4. Underground Injection		<input type="checkbox"/> c. Burner	
<input checked="" type="checkbox"/> 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)		<input checked="" type="checkbox"/> 7. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification	
<input type="checkbox"/> a. Generator Marketing to Burner			
<input checked="" type="checkbox"/> b. Other Marketer Processor			
<input type="checkbox"/> c. Burner			

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air ☐ B. Rail ☒ C. Highway ☐ D. Water ☐ E. Other (specify)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

<input type="checkbox"/> A. First Notification <input checked="" type="checkbox"/> B. Subsequent Notification (complete item C)		C. Installation's EPA ID Number											
		O	H	D	0	0	1	9	2	6	7	4	0

ID — For Official Use Only									
C									
W									
									T/A C

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1	2 F 0 0 2	3 F 0 0 3	4 F 0 0 4	5 F 0 0 5	6
7 	8 	9 	10 	11 	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13 	14 	15 	16 	17 	18
19 	20 	21 	22 	23 	24
25 	26 	27 	28 	29 	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 0 1 9	32 U 0 3 1	33 U 0 3 7	34 U 0 5 2	35 U 0 8 0	36 U 1 1 2
37 U 1 2 1	38 U 1 4 0	39 U 1 5 4	40 U 1 5 9	41 U 1 6 1	42 U 2 1 3
43 U 2 2 0	44 U 2 2 6	45 U 2 3 9	46 	47 U 2 2 8	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49 	50 	51 	52 	53 	54
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E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

<input checked="" type="checkbox"/> 1. Ignitable (D001)	<input checked="" type="checkbox"/> 2. Corrosive (D002)	<input type="checkbox"/> 3. Reactive (D003)	<input type="checkbox"/> 4. Toxic (D000)
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XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature <i>Robert L. Hukill</i>	Name and Official Title (type or print) Robert L. Hukill, President	Date Signed 1-27-86
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EPA Form 8700-12 (Rev. 11-85) Reverse

Hukill Chemical Corp. is a Resource Recovery Facility that Recycles, Reclaims, and Treats Hazardous Wastes from Industry. We are a founding member of the National Association of Solvent Recyclers (NASR).

EXHIBIT 2
RCRA PART A PERMIT APPLICATION
DATED SEPTEMBER 30, 1982

OHD 001926740

FORM 1	EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)	EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> E 0 H D 0 0 1 9 2 6 7 4 0 </div>
II. POLLUTANT CHARACTERISTICS INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements, see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully. If any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, II, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
PLEASE PLACE LABEL IN THIS SPACE			
III. NAME OF FACILITY <div style="border: 1px solid black; padding: 2px;"> HUKILL CHEMICAL CORPORATION </div>			
IV. FACILITY CONTACT <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> A. NAME & TITLE (last, first, & title) <div style="border: 1px solid black; padding: 2px;"> ROBERT L HUKILL </div> </div> <div style="width: 35%;"> B. PHONE (area code & no.) <div style="border: 1px solid black; padding: 2px;"> 216 232 9400 </div> </div> </div>			
V. FACILITY MAILING ADDRESS <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> A. STREET OR P.O. BOX <div style="border: 1px solid black; padding: 2px;"> 7013 KRICK ROAD </div> </div> <div style="width: 35%;"> B. CITY OR TOWN <div style="border: 1px solid black; padding: 2px;"> BEDFORD </div> </div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 35%;"> C. STATE <div style="border: 1px solid black; padding: 2px;"> OH </div> </div> <div style="width: 35%;"> D. ZIP CODE <div style="border: 1px solid black; padding: 2px;"> 44146 </div> </div> </div>			
VI. FACILITY LOCATION <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER <div style="border: 1px solid black; padding: 2px;"> 7013 KRICK ROAD </div> </div> <div style="width: 35%;"> B. COUNTY NAME <div style="border: 1px solid black; padding: 2px;"> CUYAHOGA </div> </div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 35%;"> C. CITY OR TOWN <div style="border: 1px solid black; padding: 2px;"> BEDFORD </div> </div> <div style="width: 35%;"> D. STATE <div style="border: 1px solid black; padding: 2px;"> OH </div> </div> <div style="width: 35%;"> E. ZIP CODE <div style="border: 1px solid black; padding: 2px;"> 44146 </div> </div> <div style="width: 35%;"> F. COUNTY CODE (if known) <div style="border: 1px solid black; padding: 2px;"> CUY </div> </div> </div>			

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

7 3 9 9 (specify)	SOLVENT RECYCLING	7 5 1 6 1 (specify)	CHEMICAL DISTRIBUTION
7 2 8 9 1 (specify)	CHEMICAL PACKAGING	7	(specify)

VIII. OPERATOR INFORMATION

A. NAME		B. Is the name listed in Item VIII also the name of the parent company?	
HUKILL CHEMICAL CORPORATION		<input type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify)		D. PHONE	
F - FEDERAL S - STATE P - PRIVATE	M - PUBLIC (other than federal or state) O - OTHER (specify)	P (specify)	2 1 6 2 3 2 9 4 0 0
E. STREET OR P.O. BOX		F. CITY OR TOWN	
7 0 1 3 KRICK ROAD		B E D F O R D	
G. STATE		H. ZIP CODE	
O H		4 4 1 4 6	
I. INDIAN LAND		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)		D. PSD (Air Emissions from Proposed Sources)	
9 N	0 H 0 0 6 3 4 4 4	9 P	
C. UIC (Underground Injection of Fluids)		E. OTHER (specify)	
9 U			(specify)
F. RCRA (Hazardous Wastes)		G. OTHER (specify)	
9 R			(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers, and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

We are distributors of industrial acids, alkalies and solvents. Also in connection with this report and the attached Hazardous Waste Permit Application, we are a "Resource Recovery Facility" actively engaged in recycling byproduct streams back to industry.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Emory G. Hukill, President	<i>Emory G. Hukill</i>	9/30/82

COMMENTS FOR OFFICIAL USE ONLY

C. COMMENTS FOR OFFICIAL USE ONLY

EXHIBIT 3
HAZARDOUS WASTE STORAGE TANK INFORMATION

OHD 001926740

HUKILL CHEMICAL CORPORATION
BEDFORD, OHIO

TABLE 1

SUMMARY OF HAZARDOUS WASTE STORAGE TANKS

<u>Tank ID No.</u>	<u>Capacity (gal)</u>	<u>Contents</u>
<u>More than 90 days Storage Tanks</u>		
V-114	14,000	Flammable Solvent
V-214	14,000	Flammable Solvent
V-314	14,000	Flammable Solvent
V-414	14,000	Spill Control Tank
V-514	14,000	Water - Solvent
V-614	14,000	Flammable Solvent
V-117	16,000	Flammable Solvent
6000 East	6,000	Flammable Solvent
6000 West	6,000	Flammable Solvent
Spent Acid Tank	12,000	Spent Hydrofluoric/ Sulfuric Acids
V-720 ¹	20,000	Flammable Solvent

Less than 90 days Storage Tanks

V-110M	10,000	Flammable Solvent
V-210	10,000	Flammable Solvent
V-6000-C	6,000	Flammable Solvent
V-4000-C	4,000	Flammable Solvent
V-1500-C	1,500	Flammable Solvent
#1-750-C*	750	Flammable Solvent
#2-750-C*	750	Flammable Solvent

Notes: * Taken out of service temporarily. Cleaned & Sand Blasted.

(1) New Tank

8/29/89
Ed Price

EXHIBIT 4

MANIFESTS/INVOICES AND ANALYSES

- a. Shipment of hazardous waste received 9/86
- b. Shipment of hazardous waste sent 8/86
- c. Shipment of hazardous waste received 6/89
- d. Shipment of hazardous waste sent 7/89
- e. Shipment of solid waste sent 6/89

STRAIGHT BILL OF LADING - SHORT FORM - Original - Not Negotiable.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

This property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and delivered as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of either any of said property that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Classifications in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which govern the transportation of this shipment and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CARRIER'S
NO.SHIPPER'S
NO.

22077

At BEDFORD, OHIO

19

From HUKILL CHEMICAL CORP.

CONSIGNED TO AND DESTINATION

P P G INDUSTRIES, INC.
125 Colfax Street
Springdale, Pa. 15144

P0720

ARRIVE UNLOADING POINT	
A.M.	
P.M.	
LEAVE UNLOADING POINT	
A.M.	
P.M.	

UNLOADING - EXPLAIN TO NEAREST 1/4 HOUR

A-08145

DATE ENTERED
9-15-86CUST. ORDER NO.
192DATE REQUIRED
9-18-86SHIP VIA:
Hukill Truck

NO. OF UNITS

KIND OF PACKAGES, DESCRIPTION OF ARTICLES, SPECIAL MARKS AND EXCEPTIONS

WEIGHT
SUB. TO CAR.CLASS
OR RATECK
COLL.

5300 gal.

FLAMMABLE LIQUID NOS
11RP1100

Processed Solvent

@ Bulk

UN1993

5300 gal.

FOR HELP IN CHEMICAL EMERGENCIES INVOLVING SPILL, LEAK, FIRE OR EXPOSURE, CALL
TOLL-FREE 800-424-9300 DAY OR NIGHT.

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED
AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF DOT AND E.P.A.

Howard

Rec'd _____ to apply
in payment of the charges on the property
described herein.

Agent or Cashier

(The signature here acknowledges only the amount prepaid.)

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."
NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

per

Subject to Section 7 of Conditions of applicable
bill of lading, if this shipment is to be delivered to
the consignee without recourse on the consignor,
the consignor shall sign the following statement:
The carrier shall not make delivery of this ship-
ment without payment of freight and all other
lawful charges.

HUKILL CHEMICAL CORP.

(Signature of consignor)

If charges are to be prepaid, write or stamp
here, "To be Prepaid."

Charges Advanced:

HUKILL CHEMICAL CORP. Shipper, Per

Agent, per

Permanent postoffice address of shipper, 7013 Krick Road, Bedford, Ohio 44146

HCC-1



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 2063
Harrisburg, PA 17120

R-SWM-51:REV. 10/84

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)
Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PA D0043363190-0264	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law but is required by State law.	
3. Generator's Name and Mailing Address PPG Industries, Inc I-05576 125 Colfax St Springdale, PA 15144			A. State Manifest Document Number PAB 3108722		B. State Gen. ID	
4. Generator's Phone (412) 274-7900			C. State Trans. ID PA-AH 101-43		D. Transporter's Phone (800) 628-5225	
5. Transporter 1 Company Name Matlack, Inc			6. US EPA ID Number DE D981110166		E. State Trans. ID PA-AH	
7. Transporter 2 Company Name			8. US EPA ID Number		F. Transporter's Phone ()	
9. Designated Facility Name and Site Address Hukill Chemical 7013 Krick Rd Bedford, OH 44146			10. US EPA ID Number OH HD001926740		G. State Facility's ID Not Required	
			H. Facility's Phone (216) 232-9400			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers		13. Total Quantity	
a. Waste Flammable Liquid, N.O.S. Flammable Liquid UN1993 RQ-Xylene			No. Type		14. Unit Wt/Vol	
			1		FT 47.06 d P F00.5	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code)			K. Handling Codes for Wastes Listed Above			
a. Haz. Code Physical State II L			c. Haz. Code Physical State II L		a. b.	
b. Haz. Code Physical State II L			d. Haz. Code Physical State II L		c. d.	
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002 (b) of RCRA, I also certify that I have a program in place to reduce volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.						
Printed/Typed Name Kathryn B. Frey			Signature Kathryn B. Frey		Month Day Year 10 9 09 86	
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature G. McKinnis		Month Day Year 10 9 09 86	
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Month Day Year	
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Rick W. Duncan			Signature Rick W. Duncan		Month Day Year 10 11 9 86	

PAB 3108722

SAMPLE ANALYSIS

DATE September 8, 1986 BULK XXXX DRUMS
 MANIFEST #: I-05576 DATE RECEIVED: 9/9/86
 CUSTOMER NAME: PPG - SPRINGDALE DATE SAMPLED: 9/9/86
 CUSTOMER CODE #: P-11 NO. OF SAMPLES: 2
 JOB ORDER #: A-8145 STORAGE AREA: 6000 Can
 TOTAL RECEIVED: 47,060 + 6,480 gal SIGNED: Paul

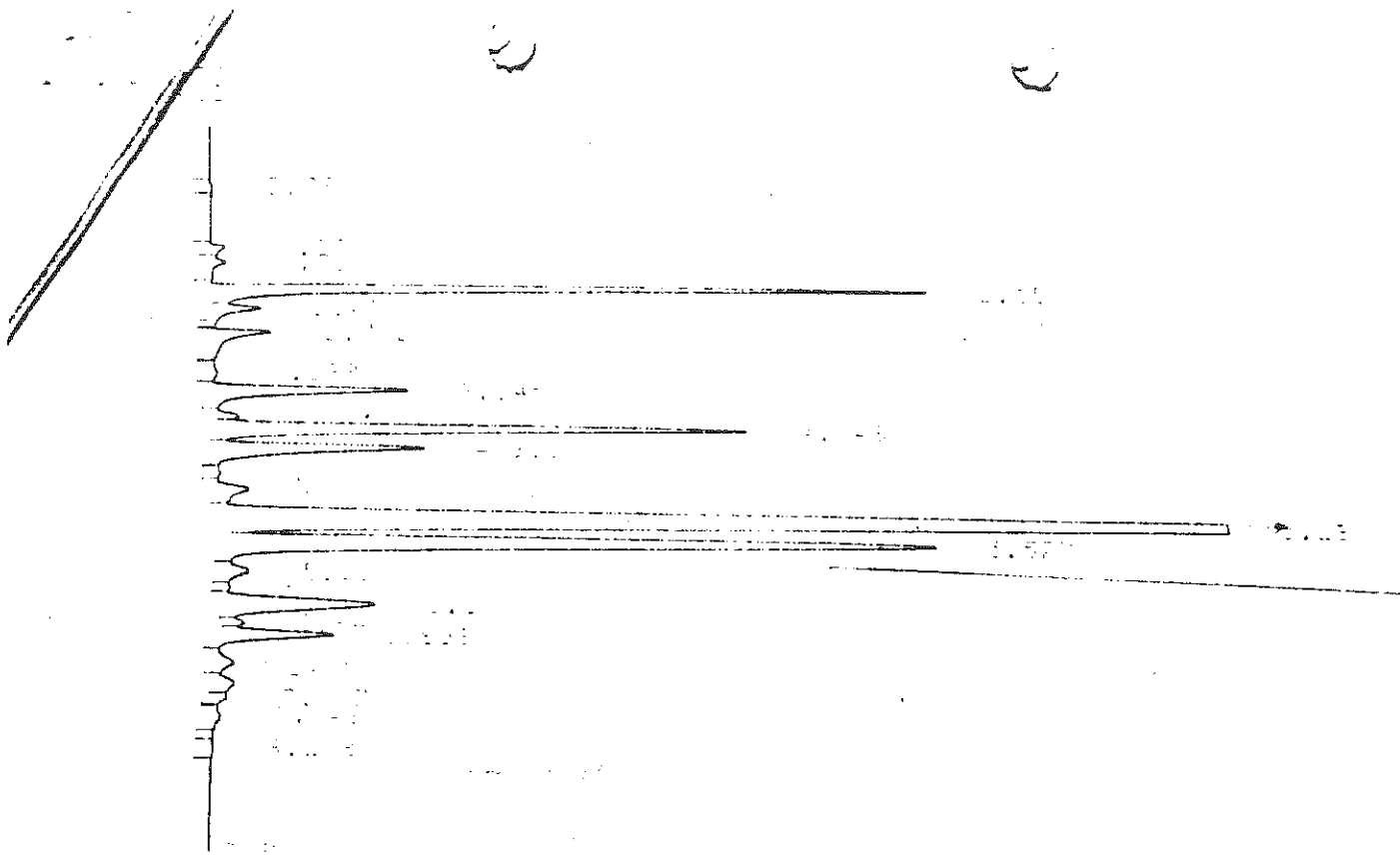
SAMPLE RESULTS	FLASH POINT	#/GAL.	ODOR	G.C. RUN	WATER CONT.	COMMENTS
BULK COMPOSITE	<100°	7.262	Proc. Solv.			
DRUM #			PLB - .373% C1			
DRUM #				11,904 BTU's		
DRUM #						
DRUM #						

SAMPLE DISTILLATION REPORT

LUWA OR TOWER: APPROX. YIELD:
 WATER CONTENT: FLASH POINT: <100°
 ODOR: Proc. Solv. G.C. ANALYSIS:
 COMMENTS:

APPEARANCE - THIN, GRAY LIQUID

SIGNED: Carl E. Muniz



10-11940 1-119

1-119 1

1-119 1

1	1.11	1.11	1.11
2	1.59	1.59	1.59
3	1.79	1.79	1.79
4	2.13	2.13	2.13
5	2.49	2.49	2.49
6	2.79	2.79	2.79
7	3.19	3.19	3.19
8	3.59	3.59	3.59
9	3.99	3.99	3.99
10	4.39	4.39	4.39
11	4.79	4.79	4.79
12	5.19	5.19	5.19
13	5.59	5.59	5.59
14	5.99	5.99	5.99
15	6.39	6.39	6.39
16	6.79	6.79	6.79
17	7.19	7.19	7.19
18	7.59	7.59	7.59
19	7.99	7.99	7.99
20	8.39	8.39	8.39
21	8.79	8.79	8.79
22	9.19	9.19	9.19
23	9.59	9.59	9.59
24	9.99	9.99	9.99
25	10.39	10.39	10.39
26	10.79	10.79	10.79
27	11.19	11.19	11.19
28	11.59	11.59	11.59
29	11.99	11.99	11.99
30	12.39	12.39	12.39

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OHD001926740		Manifest Document No. 68025		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
		3. Generator's Name and Mailing Address Hukill Chemical Corporation, 7013 Krick Road, Bedford, Ohio 44146		6. US EPA ID Number OHD075006304		A. State Manifest Document Number		B. State Generator's ID	
4. Generator's Phone (216) 232-9400		5. Transporter 1 Company Name Chem Freight		8. US EPA ID Number		C. State Transporter's ID		D. Transporter's Phone 216-439-2955	
7. Transporter 2 Company Name		9. Designated Facility Name and Site Address Systech Corporation St. Highway 127 Paulding, Ohio		10. US EPA ID Number OHD005048947		E. State Transporter's ID		F. Transporter's Phone	
						G. State Facility's ID		H. Facility's Phone 419-399-4835	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.	
a. <input checked="" type="checkbox"/> Waste Flammable Liquid NOS FLAMMABLE LIQUID UN1993		No. Type 1 T/T		6,000		G		F003, F005	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above							
11,964 B.T.U.'s; 3.81% Cl ₂ ; 8.522 #/gal.									
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.									
Printed/Typed Name		Signature		Month		Day		Year	
Robert L. Hukill - President		Robert Hukill		08		29		86	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name		Signature		Month		Day		Year	
William Barr		William Barr		08		29		86	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name		Signature		Month		Day		Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name		Signature		Month		Day		Year	
Barbara M. Rife		Barbara M. Rife		08		29		86	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 0 H D 0 4 9 3 7 2 1 5 4 0 9 6 0 0		Manifest Document No. 0 0 1 1 9 2 6 7 4 0		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address COOK PAINT & VARNISH COMPANY, 12815 Elmwood Avenue Cleveland, Ohio 44111						A. State Manifest Document Number							
4. Generator's Phone (216) 252-4050						B. State Generator's ID							
5. Transporter 1 Company Name Hukill Chemical Corporation						6. US EPA ID Number 0 H D 0 0 1 9 2 6 7 4 0		C. State Transporter's ID					
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone 216-232-9400					
9. Designated Facility Name and Site Address HUKILL CHEMICAL CORPORATION 7013 Krick Road Bedford, Ohio 44146						10. US EPA ID Number 0 H D 0 0 1 9 2 6 7 4 0		E. State Transporter's ID					
								F. Transporter's Phone					
								G. State Facility's ID					
								H. Facility's Phone (216) 232-9400					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. X RQ Waste Paint Related Material, N.O.S. FLAMMABLE LIQUID NA1263 (F003, F005)						0 0 1 T T		6 30 0		G		F003, F005	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information Send Manifest Attn: Betty Magovich													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name Betty Magovich						Signature <i>Betty Magovich</i>		Month Day Year 06 11 89					
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>Jerry Moskaluk</i>		Month Day Year 06 11 89					
Printed/Typed Name JERRY MOSKALUK						Signature		Month Day Year					
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature		Month Day Year					
Printed/Typed Name						Signature		Month Day Year					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name Debbie HSYAS						Signature <i>Debbie HSYAS</i>		Month Day Year 06 11 89					

SAMPLE ANALYSIS

DATE June 13, 1989 BULK ☒ DRUMS
 MANIFEST #: 09600 DATE RECEIVED: 6-21-89
 CUSTOMER NAME: COOK PAINT & VARNISH DATE SAMPLED: 6-21-89
 CUSTOMER CODE #: C-39 NO. OF SAMPLES: 1
 JOB ORDER #: A-10670 STORAGE AREA: 129
 TOTAL RECEIVED: 6203 SIGNED: Deu

SAMPLE RESULTS	FLASH POINT	#/GAL.	ODOR	G.C. RUN	WATER CONT.	COMMENTS
BULK COMPOSITE	<u><100°F</u>	<u>7.29</u>	<u>PROCESS SOLVENT.</u>	<u>—</u>	<u>—</u>	
DRUM #						
DRUM #						
DRUM #						
DRUM #						

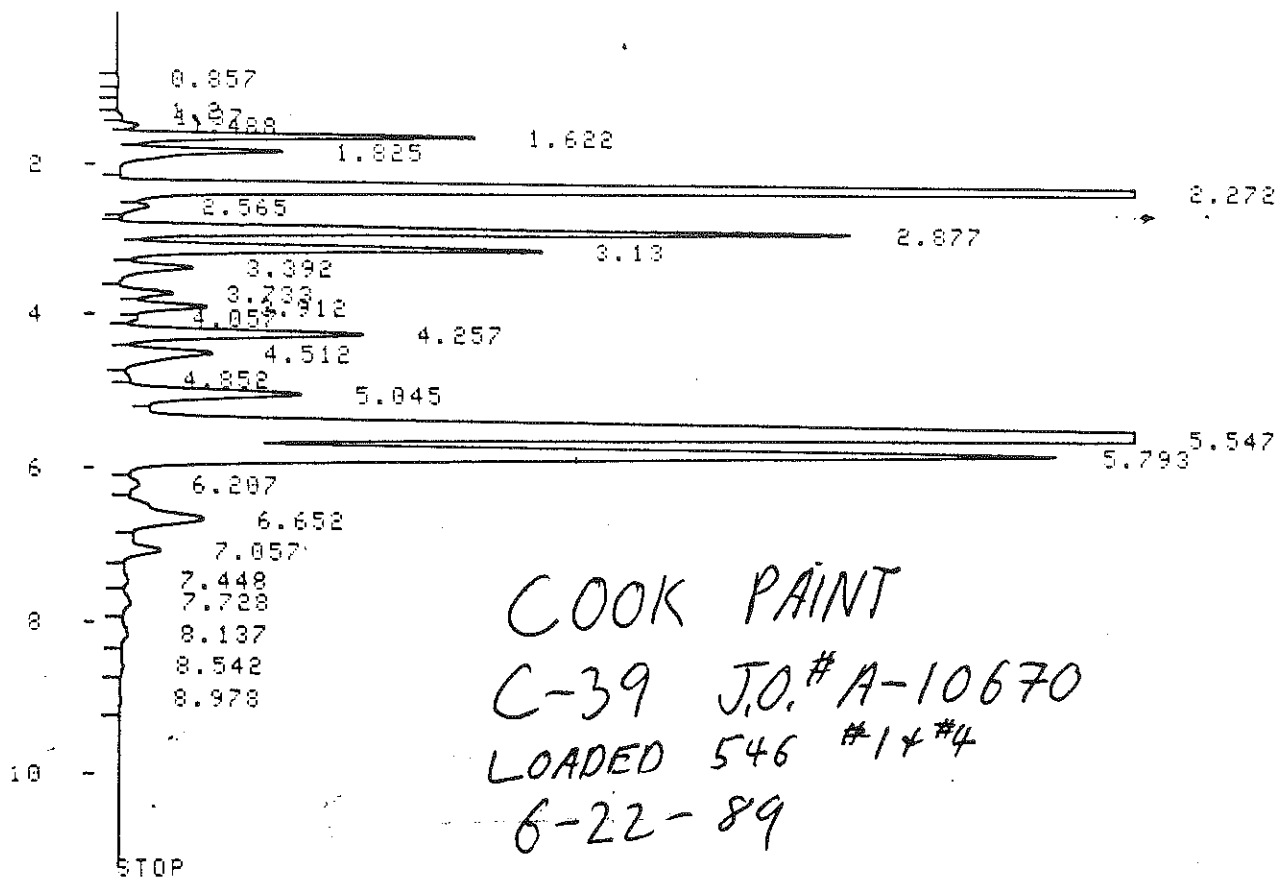
SAMPLE DISTILLATION REPORT

LUWA OR TOWER: APPROX. YIELD:
 WATER CONTENT: FLASH POINT: <100°F
 ODOR: Process Solvent G.C. ANALYSIS:
 COMMENTS:

Grey thin liquid.

SIGNED: Mark D. Mather

START
17:46:16
69/06/22
3



COOK PAINT
C-39 J.O.# A-10670
LOADED 546 #1 & #4
6-22-89

CHROMATOPAC C-R3A
SAMPLE NO 0
REPORT NO 35610

FILE 5
METHOD 461

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	1.37	1517	V		0.0807	
2	1.488	3807	V		0.2025	- ETOH.
3	1.622	53395	V		2.8398	- ACETONE / IPA.
4	1.825	33971	V		1.8067	- MECL.
5	2.272	418335	SV		22.2492	- MEK
6	2.565	2523	T		0.1342	
7	2.877	139532	V		7.421	- BUOH.
8	3.13	84931	V		4.5171	} HEPTANES + HEXANES
9	3.392	17661	V		0.9393	
10	3.733	11998	V		0.6381	} HEPTANES + HEXANES
11	3.912	19698	V		1.0476	
12	4.057	4083	V		0.2171	
13	4.257	55740	V		2.9645	- TOLUENE
14	4.512	28673	V		1.525	- BUOAC.
15	4.852	3870	V		0.2058	} XYLENE
16	5.045	51296	V		2.7282	
17	5.547	579998	V		30.8472	
18	5.793	287721	V		15.2025	

[illegible]

SHIPPER'S NO. 37865

19

CONSIGNED TO AND DESTINATION

COOK PAINT & VARNISH COMPANY CO680
12815 Elmwood Avenue
Cleveland, Ohio 44111

ARRIVE
UNLOADING
POINT

A.M.

P.M.

LEAVE
UNLOADING
POINT

A.M.

P.M.

UNLOADING - EXPLAIN TO NEAREST ¼ HOUR

A-10670

DATE ENTERED
6/22/89

CUST. ORDER NO.
C-14055

DATE REQUIRED.
6/23/89

SHIP VIA:

Hukill Truck DRIVER MUST WEAR EYE PROTECTION ON PREMISES

NO. OF UNITS

KIND OF PACKAGES, DESCRIPTION OF ARTICLES, SPECIAL MARKS AND EXCEPTIONS

* WEIGHT
SUB. TO COR.

CLASS
OR RATE

EX. COLL.	
--------------	--

4,000 Gal.

FLAMMABLE LIQUID, N.O.S.

11RC3900

Paint Thinning Compound

@ Bulk

NA1263

4000	Gal.
------	------

CODE: T-95

G. C. ANALYSIS MUST ACCOMPANY SHIPMENT

FOR HELP IN CHEMICAL EMERGENCIES INVOLVING SPILL, LEAK, FIRE OR EXPOSURE, CALL
TOLL-FREE 800-424-9300 DAY OR NIGHT.

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF DOT AND E.P.A.

Rec'd _____ to copy
in orderment of the charge on the property
described herein

Agency or Cashier

(The statement here acknowledges only the amount present)

*If the shipper moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the part of the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

If charges are to be prepaid, write or stamp
here, "If to be prepaid."

Bill Howard/cjt

Charges Advanced

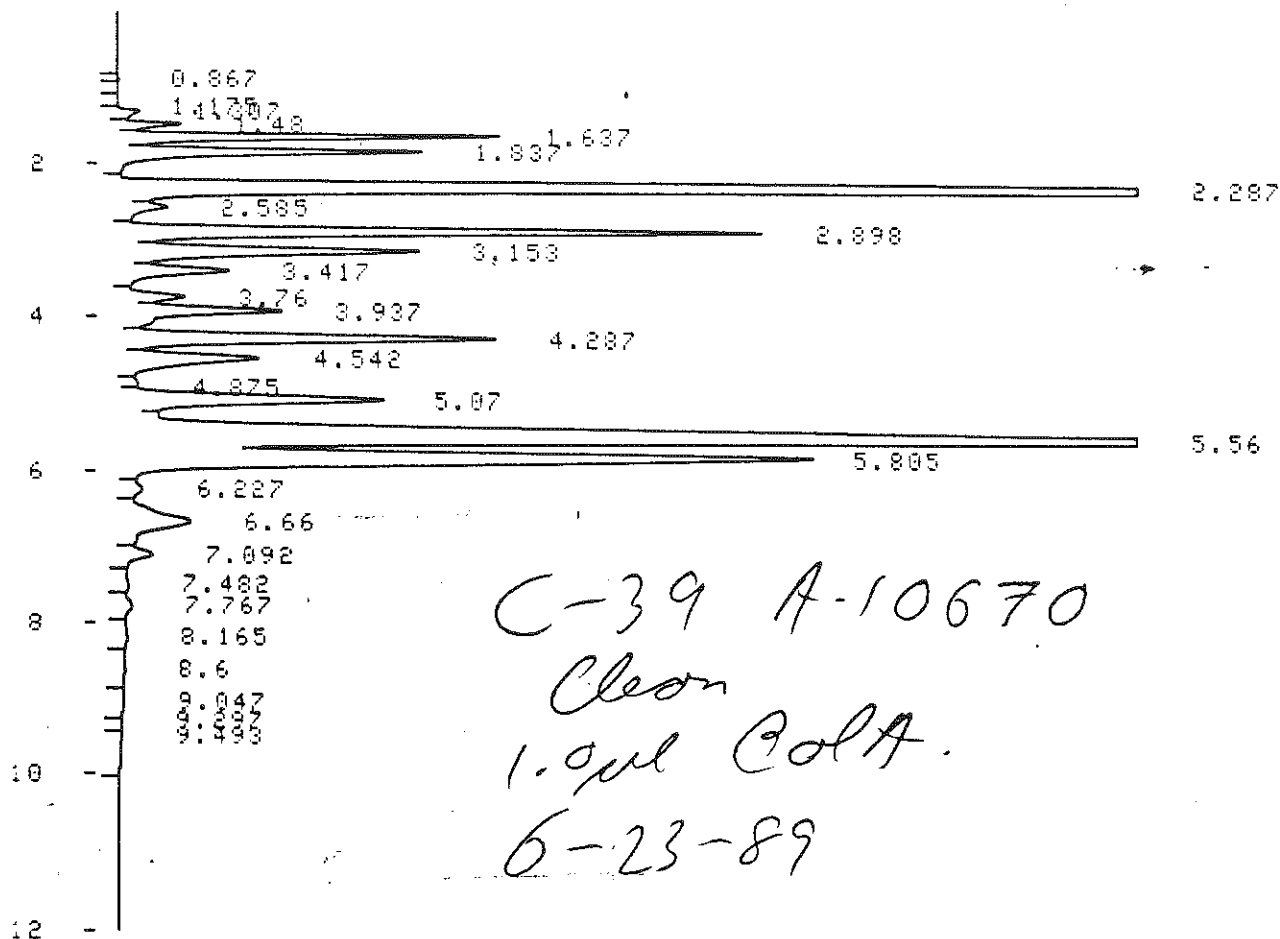
HUKILL CHEMICAL CORP. Shipper, Per

Agent, per

Permanent postoffice address of shipper, 7013 Krick Road, Bedford, Ohio 44011
MCC-1

HCC-1

START
19:36:50
83/06/23
5



CHROMATOPAC C-R3A
SAMPLE NO 0
REPORT NO 35643

FILE 5
METHOD 461

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	1.307	4336	V		0.2271	
2	1.48	10383	V		0.5438	
3	1.637	59648	V		3.1241	
4	1.837	57406	V		3.0067	
5	2.287	484373	V		25.3692	
6	2.585	14592	V		0.7642	
7	2.898	130320	V		6.8256	
8	3.153	72785	V		3.8121	
9	3.417	29189	V		1.5288	
10	3.76	16632	V		0.8711	
11	3.937	44240	V		2.3171	
12	4.287	90145	V		4.7214	
13	4.542	43577	V		2.2824	
14	4.875	5259	V		0.2755	
15	5.07	72924	V		3.8194	
16	5.56	453546	V		23.7546	
17	5.805	224914	V		11.7799	
18	6.227	10021	V		0.5248	
19	6.66	42782	V		0.241	

DNR

MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐Required under authority of Act 64, PA
1979, as amended and Act 136, PA
1969.Failure to file is punishable under
section 299.548 MCL or Section 10 of
Act 136, PA, 1969.

Please print or type

Form Approved OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

0 H P 0 0 1 9 2 6 7 4 0 9 1 3 2 8

Manifest
Document No.2. Page 1
of 1Information in the shaded areas
is not required by Federal
law

3. Generator's Name and Mailing Address

Hukill Chemical Corporation, 7013 Krick Road,
Bedford, Ohio 44146

A. State Manifest Document Number

MI 1765060

4. Generator's Phone (216) 232-9400

B. State Generator's ID

5. Transporter 1 Company Name

Valley City Refuse & Disposal

6. US EPA ID Number

M I D 9 8 1 9 5 6 9 6 3

C. State Transporter's ID

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (616) 235-1501

E. State Transporter's ID

9. Designated Facility Name and Site Address

Systech Corporation

Ford Avenue

Alpena, Michigan 49707

10. US EPA ID Number

M I D 9 8 1 2 0 0 8 3 5

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

(517) 354-3122

11. US DOT Description (including Proper Shipping Name, Hazard Class, and
ID NUMBER).a. X RQ Waste Flammable Liquid, N.O.S. FLAMMABLE
LIQUID UN1993 (P003, P005)

12. Containers

No. Type

13. Total
Quantity14. Unit
Wt/Vol15. Waste
No.

N/H

0 0 1 T T

5 6 0 0 0 G

P 0 0 3

P 0 0 3

N

N

J. Additional Descriptions for Materials Listed Above

BTU's = 10,180

WT. = 8.45

CL = 1.80

K. Handling Codes for Wastes
Listed Above

a. 2

b. 1

c. 1

d. 1

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway
according to applicable international and national government regulations.If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined
to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the
present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste
generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Robert Lang - Processing Supervisor

Signature On Behalf of Hukill Chemical

Robert Lang

Date

Month Day Year

12 05 88

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in
Item 19.

Printed/Typed Name

Deborah M. Johns

Signature

Deborah M. Johns

Date

Month Day Year

12 05 88

UNIFORM HAZARDOUS WASTE MANIFEST				1. Generator's US EPA ID No. 0 H D 0 0 1 9 2 6 7 4 0 9 1 0 0 7		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address HUKILL CHEMICAL CORPORATION, 7013 Krick Road, Bedford, Ohio 44146								A. State Manifest Document Number							
4. Generator's Phone (216) 232-9400								B. State Generator's ID							
5. Transporter 1 Company Name Ross Transportation Services, Inc.				6. US EPA ID Number 0 H D 9 8 0 6 1 4 3 7 4				C. State Transporter's ID							
7. Transporter 2 Company Name				8. US EPA ID Number				D. Transporter's Phone (216) 748-2171							
								E. State Transporter's ID							
								F. Transporter's Phone							
9. Designated Facility Name and Site Address Ross Incineration Service 394 Grafton Road Grafton, Ohio 44044								10. US EPA ID Number 0 H D 0 4 8 4 1 5 6 6 5							
								G. State Facility's ID							
								H. Facility's Phone (216) 748-2171							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)								12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. X Waste Flammable Liquid, N.O.S. LIQUID UN1993 FLAMMABLE (D001)								0 5 4 D M		2 7 0 0 0 0		P		D001	
b. X Waste Flammable Liquid, N.O.S. LIQUID UN1993 FLAMMABLE (D001)								0 1 2 D M		0 3 6 0 0 0		P		D001	
c. X Waste Flammable Liquid, N.O.S. LIQUID UN1993 FLAMMABLE (D001)								0 2 2 D M		1 1 0 0 0 0		P		D001	
d.															
J. Additional Descriptions for Materials Listed Above								K. Handling Codes for Wastes Listed Above							
a. W.P.S. #31275 - 54 Drums Plant Clean-up Solidified															
b. W.P.S. #29435 - 12 Drums Solvent Impregnated Rags															
c. W. P.S. #29680 - 22 Drums Waste Adhesives															
15. Special Handling Instructions and Additional Information															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.															
Printed/Typed Name Robert Lang - Processing Supervisor						Signature On Behalf of Hukill Chemical Robert Lang						Month Day Year 10 6 30 89			
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature C. Weaver						Month Day Year 10 6 30 89			
Printed/Typed Name C. WEAVER FOR ROSS															
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature						Month Day Year			
Printed/Typed Name															
19. Discrepancy Indication Space															
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.															
Printed/Typed Name Byron McConnell						Signature Byron McConnell						Month Day Year 10 6 17 89			

EXHIBIT 5
NOTIFICATIONS FROM HUKILL CHEMICAL CORPORATION CUSTOMERS

OHD 001926740

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. CLARK
STEPHEN V. MCNEIL
D. STEWART MITCHELL
DAVID G. OLSON
RAYMOND POLLOCK
DAVID H. WITTELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVEN T. MASON BUILDING
600 JOHN
LANSING, MI 48201

RONALD C. SAGOR, Director

Hazardous Waste Facility Blend

May 15, 1986

Mr. J. M. Piccuch
Division President
National Cypress Company
Cement Division
Ford Avenue
Alpena, Michigan 49707

*Systech Corporation
Alpena, MI, Location.*

Dear Mr. Piccuch:

This letter is in reference to your Permit to Install applications for a) a modified process in cement kiln numbers 22 and 23 to include firing the kilns with waste-derived fuel and b) a tank farm with six 25,000 gallon capacity tanks, located on Ford Avenue, Alpena, Michigan.

These applications, identified as Nos. 126-86A and 127-86A, respectively, have been evaluated and approved by the Michigan Air Pollution Control Commission.

This approval is based upon and subject to compliance with all administrative rules of the Commission and conditions stipulated in the attached supplements. Please review these conditions thoroughly so that you may plan for and take the actions necessary to ensure compliance with all of these conditions. Also note that Condition No. 1 of each permit requires you to apply, in writing, for a permit to operate within 30 days after completion of construction.

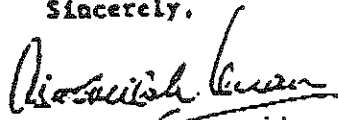
You are advised that contaminants discharged to the surface waters and/or atmosphere; materials disposed of on land; hazardous waste storage, treatment, and disposal; and resource recovery facilities must be approved by other divisions of the Department of Natural Resources. For assistance in determining what approval may be required, you may contact the Department's Permit Assistance Division at 517-373-8542. Additionally, your plant operations must be in compliance with all applicable requirements of the Department of Public Health and Labor.

Finally, your Permit to Install application Nos. 126-86 and 127-86 have been issued because the above permits (126-86A and 127-86A) supersede these

Mr. J. M. Plecuch
May 15, 1986
Page 2

Thank you for your cooperation. Please contact me if you have any questions regarding these permits.

Sincerely,



Asad Khan, Engineer
Southeast Permit Unit
Air Quality Division
(517) 373-7023

AK:jmc
Enclosure
cc: Ardon Toland
Thomas T. Wheeler

SYSTEM CORPORATION

Paulding Location

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF

5HW-13

AUG 17 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hazardous Waste Fuel Blend

Mr. James C. Poole
Vice President, Peninsular Division
General Portland, Inc.
P.O. Box 1019
Fort Wayne, Indiana 46801

RE: General Portland, Inc.
Paulding, Ohio
U.S. EPA ID # OHD 005-048-947

Dear Mr. Poole:

Enclosed is a copy of the final Resource Conservation and Recovery Act (RCRA) permit for your proposed facility at the above-referenced location. The effective date of the permit, as issued, is the date indicated on the cover page of the permit.

The duration of the permit is ten (10) years. However, the United States Environmental Protection Agency may modify, revoke, reissue or terminate this permit based on causes specified in 40 Code of Federal Regulations (CFR) Section 270.40 and 270.41.

You have the right to appeal any condition of the permit pursuant to 40 CFR Section 124.19. The failure of your company to meet any portion of the permit could result in civil and/or criminal penalties.

Sincerely,

Basil G. Constantelos

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Steven White
Ohio Environmental Protection Agency

Peggy Vince
Ohio Hazardous Waste Facility Approval Board

Dr. John C. Chadbourne
General Portland, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
HAZARDOUS WASTE MANAGEMENT PERMIT

Name of Permittee: General Portland, Inc.

Facility Location: County Road 176, Paulding, Ohio

EPA Identification Number: OHD 005-048-947

Effective Date: 30 days after service of notice unless review requested
under 40 CFR 124.19.

Expiration Date: Ten (10) years after the effective date

Authorized Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC., §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (U.S. EPA) codified and to be codified in Title 40 of the Code of Federal Regulations, a permit is issued to General Portland, Inc. (hereafter called the Permittee) to operate a hazardous waste storage facility located in Paulding, Ohio, on County Road 176 at latitude 41 degrees 10'46" and longitude 84 degrees 36'43". You are authorized to conduct the following hazardous waste management activities:

<u>X</u> Storage	<u> </u> Treatment	<u> </u> Disposal
<u> </u> Container	<u> </u> Tank	<u> </u> Injection Well
<u>X</u> Tank	<u> </u> Surface Impoundment	<u> </u> Landfill
<u> </u> Waste Pile	<u> </u> Incinerator	<u> </u> Land Application
<u> </u> Surface Impoundment	<u> </u> Other (Detonation)	<u> </u> Surface Impoundment

Applicable Regulations:

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

<u>X</u> 261	<u>X</u> 264, Subpart G	<u> </u> 264, Subpart K
<u>X</u> 262	<u>X</u> 264, Subpart H	<u> </u> 264, Subpart L
<u>X</u> 264, Subpart A-E	<u> </u> 264, Subpart I	<u> </u> 264, Subpart O
<u> </u> 264, Subpart F	<u>X</u> 264, Subpart J	<u>X</u> 270

Permit Approval:

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit (see 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the final permit application, as amended, (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.42 and §270.43) and potential enforcement action. The Permittee must inform U.S. EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

Issued this 17th day of August, 1984

by David Strickland
Basil G. Constantelos, Director
Waste Management Division

*Used for incineration of solids not acceptable
for Hazardous Waste Fuels Blend.*



ACKNOWLEDGMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. Number

TXD055141378

Installation Address

ROLLINS ENVIRONMENTAL SERVICES (TX) INC.
P. O. BOX 609
DEER PARK

TX 77536

2027 BATTLEGROUND ROAD
DEER PARK

TX 77536

EPA Form 8700-12A (4-80)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

January 4, 1983

William B. Philipbar, Jr., President
Rollins Environmental Services, Inc.
One Rollins Plaza
Wilmington, Delaware 19899

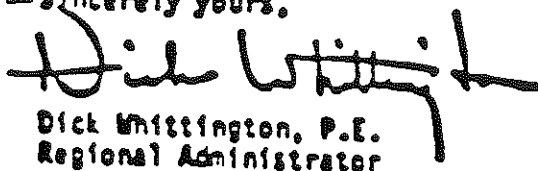
Dear Mr. Philipbar:

Based on the results of trial burns conducted at your Deer Park facility in November 1981, and July 1982, I hereby grant approval to you to incinerate liquids and solids containing PCBs at the Rollins Environmental Services facility at Deer Park, Texas, under the authority of Section 6 of the Toxic Substances Control Act. The approval is subject to the enclosed conditions, and supercedes the approval that was effective on March 4, 1981. A public hearing was held on November 30, 1982, at the Deer Park campus of San Jacinto Jr. College to receive public comments on the application.

Violation of 40 CFR, Part 761 or any condition included as part of the approval may subject Rollins to enforcement action under TSCA and other applicable laws and regulations and/or termination, revocation, or modification of the approval. Furthermore, receipt of evidence that: (1) a misrepresentation of any material fact has been made in any Rollins submittal; (2) that all relevant facts have not been disclosed; or (3) that the nature of the disposal process has substantially changed from the effective date of this approval shall constitute sufficient cause for revocation or modification of the approval.

This approval shall be effective on the date of receipt of this letter.

-Sincerely yours,


Dick Whittington, P.E.
Regional Administrator

cc: Bill Stewart
Texas Air Control Board

Enclosure



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

RECEIVED

MAR 04 1982

REPLY TO ATTENTION OF

MAR 2 1982

RCRA ACTIVITIES

Ms. Maureen M. Cromling, Executive
Vice President
Robert Ross & Sons, Inc.
394 Giles Road

Grafton, OH 44044

RE: Interim Status Acknowledgement USEPA ID No. OHD048415665

FACILITY NAME: Robert Ross & Sons, Inc.

Dear Ms. Cromling:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure



United States
Environmental Protection
Agency (WH-543)

Official Business
Penalty for Private Use
\$300

Washington, DC 20460

FIRST-CLASS MAIL
POSTAGE & FEES PAID
EPA
PERMIT NO. G-35

*Used for incineration of solids not acceptable
for Hazardous Waste Fuels Blends.*

TO: ROSS ROBERT & SONS INC
394 GILES ROAD
GRAFTON

OH 44044

HOLD
FIRMLY
HERE

KNOWLEDGEMENT
NOTIFICATION
HAZARDOUS
WASTE ACTIVITY

Form 8700-12A (4-80)



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

RECEIVED

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity in the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

0110040415665

REACKNOWLEDGEMENT

ROSS ROBERT & SONS INC
394 GILES ROAD
GRAFTON

OH 44044

INSTALLATION ADDRESS

394 GILES ROAD
GRAFTON

OH 44044

EPA Form 8700-12A (4-80)

EXHIBIT 6
ON-SITE PHOTOGRAPHS

OHD 001926740

Photo No. 1



Date: August 29, 1990 Picture Taken By: RB Facility Name: Hukill Chemical Corp.

Picture Description: Product solvent tanks (3) in diked tank area.

Photo No. 2



Date: August 29, 1990 Picture Taken By: RB Facility Name: Hukill Chemical Corp.

Picture Description: Detail of diked tank area.

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

RECEIVED
WMD RECORD CENTER

JUL 28 1994

Facility: Hubbell Chemical Corporation
USEPA I.D.: OH D 001-926-740 HWFB No.: 402-18-0315
Street: 7013 Kink Road
City: Bedford State: OH Zip: 44146
County: Cuyahoga Telephone: (216) 232-9400
Fax No.: _____ PUCO No.: _____
Owner/Operator: Same

Street: _____
City: _____ State: _____ Zip: _____
Telephone: _____ Fax: _____
Inspection Date: 8/10/94 Time: 9:30am - 5:00pm

Advance notice of inspection given? (yes) _____ (no) X
If so, how far in advance? _____

	Name	Agency/Title	Phone
Inspectors:	<u>Marlene Emanuelson</u>	<u>Ohio EPA</u>	<u>(616) 963-1162</u>
	<u>Adrienne LaFave</u>		<u>(216) 963-1200</u>
	<u>Carolyn Pierson</u>		
Facility Representative:	<u>Ed Price</u>	<u>Hubbell Consultant</u>	<u>(216) 232-9400</u>
	<u>Mike Mraz</u>	<u>Plant Manager</u>	

STATUS

Cond. Ex. SQG _____ SQG _____ Large Quantity Generator ☒
Treatment _____ Storage _____ Disposal _____ Transporter ☒

Part A Permit: (yes) ☒ (no) _____ Part B Permit: (yes) _____ (no) ☒
LDR Checklist Attached: (yes) _____ (no) _____
Draft Transmittal to CA 8-11-93

ACTIVITIES

Containers ☒
Tanks ☒
Wastepile _____
Landfill _____
Surface Impoundment _____

Used oil burner _____
Hazardous waste fuel burner/blender ☒
Incineration/Thermal treatment _____
Land treatment _____
Groundwater monitoring _____

SUMMARY Facility Annual Reports.

Faculty Annual Reports,

OFF SITE MANAGEMENT

[illegible]

PERMIT STATUS

GENERAL REQUIREMENTS

Y/N/NA RMK #

1. Has the owner/operator submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?

Y _____

When was the owner/operator's Part A submitted:

1981

2. Is the owner/operator operating in compliance with the terms and conditions of its HWFB permit?

N _____

If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?

Y _____

Has not been acted on yet by OC PA

If yes, what date was the PCR submitted? _____

3. Has the owner/operator submitted a Part B?

Y _____

PERMIT BY RULE REQUIREMENTS

4. Has there been a rule or statute change which has caused the owner/operator to become subject to Ohio's hazardous waste facility permitting requirements?

Y _____

- a. If so, please describe the rule change below:

April 15, 1993 F037
F038

- b. What was the effective date of the rule or statute change in Ohio?

APRIL 15, 1993

- c. Did the owner/operator submit a Part A to the Director in accordance with the requirements of OAC rule 3745-50-40 (C) (D)?

Y 5/13/93

NOTE: In accordance with 3745-50-40 (D), owners/operators are required to submit the Part A within 30 days after the date they first become subject to Ohio's TSD facility standards. Small quantity generators who treat, store or dispose of wastes were required to submit a Part A by the effective date OAC Rule 3745-50-40. [See OAC Rule 3745-50-40]

- d. Did the owner/operator notify the US EPA of its hazardous waste activity? [3745-50-40 (C) (1) (a)]

Y _____

- i. What was the date of notification? _____

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)

Y/N/NA RMK #

1. Has the facility owner/operator received an identification number from Ohio EPA (or US EPA) as required by OAC 3745-65-11?

Y

ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)

2. Has the owner/operator submitted an annual Treatment-Storage-Disposal report to the Director of Ohio EPA by March 1st of each calendar year? [3745-65-75]

Y

WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)

3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A) (1)?

Y

Have waste profiles from the generator

4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A) (3) (a)]

Y

re-profile

5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13(A) (4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13(A) (3) (b)]

N

non-hazardous waste f.p. was < 100%

6. Does o/o have a written waste analysis plan which includes the following information [3745-65-13(B) (1) through (6)]:

reanalyzed on new results showed non-

- a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13(B) (1)]

Y

- b. The test methods to be used? [3745-65-13(B) (2)]

Y

- c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13(B) (3) (a) (b)]

Y

methods change depend on the physical state of the waste

- d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13(B) (4)]

Y

annual basis see part E

- e. FOR OFF-SITE FACILITIES: The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B) (5)]

Y

- f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13 (C)]?

Y

- g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04 (A):**

NA

Does the waste analysis plan include procedures and schedules for:

- i. The sampling of impoundment contents? [3745-65-13 (B) (7)]
- ii. The analysis of test data? [3745-65-13 (B) (7)]
- iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13 (B) (7)]
- h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13 (B) (6)]

↓

✓

WASTE ANALYSIS PLAN - LDR REQUIREMENTS

NOTE: The following requirements identified in Question #7 apply to both on-site and off-site TSD facilities.

7. In accordance with OAC Rule 3745-65-13 (B) (6), does the the facility's waste analysis plan includes analytical procedures necessary to ensure compliance with the land disposal restriction requirements of Chapter 3745-59, including:

- a. Procedures for conducting the TCLP for wastes which have a CCWE treatment standard?
- b. Procedures for conducting a total constituent analysis for wastes which have a CCWE treatment standard?

N

N

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)

Y/N/NA RMK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73 which contains the following information:

a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73 (B) (1)]

Y _____

b. As required by the Appendix to 3745-65-73, does the information specified in Question 1a include:

i. Common name, EPA hazardous waste identification number and physical state (solid, liquid, gas) of the waste?

Y _____

ii. The estimated (or actual) weight, volume or density of the waste?

Y _____

iii. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73?

Y _____

c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?

N _____

d. Records of incidents which required implementation of the contingency plan?

Y Filed neg for an spill

e. Records of any waste analyses and trial tests required to be performed?

Y Kept in lab

f. Records of the inspections required by the general inspection requirements under 3745-65-15?

Y _____

g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73 (B) (6)?

NA _____

h. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73 (B) (2)]

NA _____

i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

NA _____

2. Does the operating record include documentation required to be maintained under the land disposal restriction requirements of Chapter 3745-59? [3745-65-73(b)(9) through (14)]

NA _____

NOTE: The following recordkeeping requirements are applicable only to off-site TSDS.

3. Are manifests received by the facility signed and dated? [3745-65-71(A)(1)]
4. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?
- b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?

Y _____

Y _____

NA _____

Y _____

Y _____

NA _____

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A) (1) (2)] If so,

Y _____

- a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]

Y _____

- b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]

Y _____

- c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]

Y _____

2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,

Y _____ in the Pa
B Permit
Applicant

- a. Is the schedule kept at the facility? [3745-65-15(B) (2)]

Y _____ In the
Part B
in the Pa
@

- b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B) (3)]

Y _____ fast
Tanker Pa
area

- c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B) (4)]

Y _____

NOTE: See Preparedness and Prevention checklist for additional testing/recordkeeping requirements applicable to emergency equipment.

REMARKS - GENERAL INSPECTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)

Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]
- b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]

Y
Y

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -
 - a. A 24-hour surveillance system, or;
 - b. An artificial or natural barrier and a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]

* Amywell
Y system
Y
Y

REMARKS - SECURITY REQUIREMENTS

* plant, firealarms, water tank

OAC 3745-66 CLOSURE AND POST CLOSURE

Y/N/NA RMK #

1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?
 - a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?
 - b. A description of how final closure will meet the requirements of 3745-66-11?
 - c. An estimate of the maximum amount of hazardous waste ever in inventory?
 - d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?
 - e. The year closure is expected to begin and a schedule for the various phases of closure?
 - f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]
4. Has the closure plan (and post-closure plan, if applicable) for any non land disposal unit(s) been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]

8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16?

NA

9. What permitted units at the facility have been closed in accordance with an approved closure plan?

None

10. If closure was partial, list the regulated units which remain in use at the facility:

11. If required, has the facility prepared a written post-closure plan? [3745-66-18]

N

If so, does the post-closure plan include:

a. A description of proposed ground water monitoring?

NA

b. A description of planned maintenance activities?

c. The name, address and phone number of person/office to contact during the post-closure period?

12. For disposal facilities; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19]

13. Has the owner of the property on which a disposal unit is located recorded on the deed that:

a. The land has been used to manage hazardous waste and the type, quantity and location of waste?

b. Land use is restricted under closure and post-closure rules? [3745-66-19]

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate Land Disposal Restricted wastes that do not meet treatment standards in tanks or containers. A large quantity generator who stores LDR wastes on-site for greater than 90 days becomes an operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

NOTE: The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E); 40 CFR 268.50(e)]

Y/N/NA RMK#

1. Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(a) (40 CFR 268.50(a)(2)(i)):

(a) The identification of the contents?

(b) The date which accumulation began?

2. Is the owner/operator storing land disposal restricted wastes in tanks? If so, is each tank marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(b) (40 CFR 268.50(a)(2)(ii)):

(a) A description of its contents?

(b) The quantity of each hazardous waste received?

(c) The date each period of accumulation begins? or;

(d) Is the information required by 2(a), 2(b) and 2(c) being recorded and maintained in the facility's operating record? [O.A.C. Rule 3745-59-50(A)(2)(b); 40 CFR 268.50(a)(2)(ii)]

3. Are land disposal restricted wastes being stored at the facility for greater than one year? If so,

(a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A)(1); 40 CFR 268.50(a)(1)]

Y

Y

N

Y

N

N

N

Y

N

NA

NOTE: A TSD facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B)] During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

Y/N/NA RMK#

4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days (180/270 days if SQG)? If so, N

(a) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)] NA

NOTE: In addition to complying with the requirement found in Question 4(a), the facility must also meet the requirements of 40 CFR 761.65(b). [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

REMARKS

TREATMENT OF LDR WASTES IN SURFACE IMPOUNDMENTS

Y/N/NA RMK#

1. Does the owner/operator treat wastes which are prohibited from land disposal in a surface impoundment or series of impoundments? If so, are the following conditions met:
 - (a) The residues from treatment are analyzed to determine if they meet applicable treatment standards? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)]
 - (b) The sampling method is designed so that representative samples of the sludge and the supernatant are tested separately rather than mixed to form homogeneous samples? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)]
 - (c) Treatment residues (including any liquid waste) which do not meet treatment standards or prohibition levels are removed from the impoundment at least annually? [O.A.C. Rule 3745-59-04(A) (2) (b); 40 CFR 268.4(a) (2) (ii)]
 - i. Such residues are not placed in any other surface impoundment? [O.A.C. Rule 3745-59-04(A) (2) (c); 40 CFR 268.7(a) (2) (iii)]
 - (d) Procedures and schedules for sampling the impoundment contents, analysis of test data and removal of residues which do not meet treatment standards have been established? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)]
 - i. Such procedures and schedules are specified in the facility's waste analysis plan as required by O.A.C. Rule 3745-65-13 (265.13)? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)]
 - ii. A copy of the waste analysis plan has been submitted to the Director? [O.A.C. Rule 3745-59-04(A) (4); 40 CFR 268.4(a) (4)]
 - (e) The impoundment meets the design requirements of O.A.C. Rule 3745-56-21(C) (40 CFR 264.221(c)) or 3745-67-21(A) (40 CFR 265.221(a))? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)]
 - (f) The impoundment meets groundwater monitoring requirements (unless exempt from such requirements)? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)]

NA

✓

- (g) The owner/operator has submitted a written certification to the Director which states that the surface impoundment meets the above requirements referenced in Questions 1(a) through (f)? [O.A.C. Rule 3745-59-04(A)(4); 40 CFR 268.4(a)(4)]

NA _____

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

REMARKS

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E) (1) (40 CFR 268.1(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS

Y/N/NA RMK#

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]
 - (a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]
 - (b) For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]
3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]
4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,
 - (a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?
 - (b) For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]

Y

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Y

NA

Y

Y

Y

Y

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

Y/N/NA

RMK#

5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous? N
- (a) If so, are treated waste(s) sent to a licensed solid waste disposal facility? NA
- i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:
- a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09 (D) (1) (a); 40 CFR 268.9 (d) (1) (i)]
- b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. [Rule 3745-59-09 (D) (1) (b); 40 CFR 268.9 (d) (1) (ii)]
- c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09 (D) (1) (c); 40 CFR 268.9 (d) (1) (iii)]
- ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07 (B) (5) (a) (40 CFR 268.7 (b) (5) (i)? [O.A.C. Rule 3745-59-09 (D) (2); 40 CFR 268.9 (d) (2)]

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS

For wastes that do not meet treatment standards: Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)]

Y _____

If so, does the notification include the following:

(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(1)(a); 40 CFR 268.7(a)(1)(i)]

Y _____

(b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A)(1)(b); 40 CFR 268.7(a)(1)(ii)]

Y _____

(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(1)(c); 40 CFR 268.7(a)(1)(iii)]

Y _____

(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(1)(d); 40 CFR 268.7(a)(1)(iv)]

N _____ #1

7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)]

N _____

8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A)(2); 40 CFR 268.7(a)(2)]

If so, does the notice/certification include the following:

(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(2)(a)(i); 40 CFR 268.7(a)(2)(i)(A)]

(b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(ii); 40 CFR 268.7(a)(2)(i)(B)]

(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(iii); 40 CFR 268.7(a)(2)(i)(C)]

(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(2)(a)(iv); 40 CFR 268.7(a)(2)(i)(D)]

(e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A)(2)(b); 40 CFR 268.7(a)(2)(ii)]

9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A) (2); 40 CFR 268.7(a) (2)]

NA

10. For wastes subject to a case-by-case extension, exemption or a variance: Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A) (3); 40 CFR 268.7(a) (3)]

NA

If so, does the notice contain the following information:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A) (3) (a); 40 CFR 268.7(a) (3) (i)]
- (b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07 (A) (3) (b); 40 CFR 268.7(a) (3) (ii)]
- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07 (A) (3) (c); 40 CFR 268.7(a) (3) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07 (A) (3) (d); 40 CFR 268.6(a) (3) (iv)]
- (e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07 (A) (3) (e); 40 CFR 268.7(a) (3) (v)]

✓

11. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07 (A) (6); 40 CFR 268.7(a) (7)]

Y

REMARKS

#1 Only one manifested shipment was missing the required LDR form. All other wastes that Hukill manifested off-site were OK. Missing LDR form for Manifest # 303946
Essex Materials, Inc.

LDR - TREATMENT FACILITY REQUIREMENTS

REQUIRED TREATMENT

Y/N/NA

RMK#

1. Does the facility treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?

NA

- (a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42 (40 CFR 268.42)?
- (b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [O.A.C. Rule 3745-59-42(B); 40 CFR 268.42(b)]

2. Does the facility treat restricted wastes for which a concentration level has been established as the LDR treatment standard?

If so, does the treatment facility test its waste treatment residues according to the following requirements:

- (a) For wastes with treatment standards expressed as a concentration in the waste extract (a CCWE standard found in O.A.C. Rule 3745-59-41; 40 CFR 268.41):

Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [O.A.C. Rule 3745-59-07(B) (1); 40 CFR 268.7(b) (1)]

- (b) For wastes with treatment standards expressed as concentrations in the waste (a CCW standard found in Rule 3745-59-43; 40 CFR 268.43):

Does the treatment facility test treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (3); 40 CFR 268.7(b) (3)]

3. Does the treatment facility combine waste streams together for the purposes of treatment which have a concentration based LDR treatment standard for the same constituent(s)?

- (a) If so, does the treatment facility ensure that the more stringent standard for the mixture is met? [O.A.C. Rule 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.

Y/N/NA RMK#

4. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal?

If so, does the treatment facility provide the land disposal facility with a written notice containing the following:

- (a) EPA hazardous waste number? [3745-59-07(B) (4) (a); 40 CFR 268.7(b) (4) (i)]
- (b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B) (4) (b); 40 CFR 268.7(b) (4) (ii)]
- (c) The manifest number associated with the shipment of waste? [3745-59-07(B) (4) (c); 40 CFR 268.7(b) (4) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(B) (4) (d); 40 CFR 268.7(b) (4) (iv)]

5. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,

For wastes and/or treatment residues generated from the treatment of a waste which has a **concentration based** treatment standard:

- (a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]
- (b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i))?

For wastes and/or treatment residues generated from the treatment of a waste which has a **technology based** treatment standard:

- (c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the waste has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42)? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]

NA

(d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. Rule 3745-59-07(B) (5) (b) (40 CFR 268.7(b) (5) (ii))?

NA

6. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,

(a) Is the facility complying with the generator notification requirements? [O.A.C. Rule 3745-59-07(B) (6); 40 CFR 268.7(b) (6)]

✓

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

7. Does the facility treat characteristic hazardous waste(s) to render such waste(s) non-hazardous?

N/A

(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

i. If so, with each shipment of waste, does the generator submit a notification/certification to the Regional Administrator/Director which contains the following:

a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D) (1) (a); 40 CFR 268.9(d) (1) (i)]

b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09(D) (1) (b); 40 CFR 268.9(d) (1) (ii)]

c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D) (1) (c); 40 CFR 268.9(d) (1) (iii)]

ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i))? [O.A.C. Rule 3745-59-09(D) (2); 40 CFR 268.9(d) (2)]

✓

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes,

N _____

(a) List the waste(s) affected:

(b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05 (C)]

(c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes,

N _____

(a) List the waste(s) affected:

(b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44 (C)]

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NO MIGRATION PETITION

Y/N/NA

RMK#

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes,

X

(a) List the waste(s) affected:

- (b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)]

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?

X

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?

|

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)?

|

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

↓

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

Y/N/NA RMK#

1. Does the land disposal facility retain copies of LDR notices and certifications? [O.A.C. Rule 3745-59-07(C) (1); 40 CFR 268.7(c) (1)]
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the the facility's waste analysis plan to ensure compliance with applicable LDR treatment standards, including: [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (a) Conducting the TCLP to test waste/residues which have a CCWE concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (b) Conducting a total constituent analysis to test waste/residues which have a CCW concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (c) Is testing specified in 2(a) and 2(b) conducted in accordance with the frequency set forth in the facility's waste analysis plan? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
- NOTE: Analytical testing of residues which have been generated from treatment of a waste which has a technology based treatment standard only is not required.
3. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which meet applicable concentration based treatment standards of O.A.C. rules 3745-59-41 or 3745-59-43 (268.41 or 268.43) are disposed of? [O.A.C. Rule 3745-59-40(A), (C); 40 CFR 268.40(a), (c)]
4. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which have been treated using the specified technology of O.A.C. Rule 3745-59-42 (40 CFR 268.42) are disposed of? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

NA

OAC 3745-58 HAZARDOUS WASTE BURNED FOR ENERGY RECOVERY

Y/N/NA RMK #

1. Does the facility:

- a. Generate hazardous waste fuel?
If so, complete Generator Requirements checklist
- b. Transport hazardous waste fuel?
If so, complete Transporter Requirements checklist
- c. Market hazardous waste fuel?
If so, the facility is subject to 3745-58-45
- d. Burn hazardous waste fuel?
If so, the facility is subject to 3745-58-46

Y
Y
Y
N

MARKETER AND BURNER REQUIREMENTS (OAC 3745-58-45 AND 3745-58-46)

- 2. Has the marketer/burner filed a Notification of Hazardous Waste Activity Form with the US EPA? [3745-58-45(B)]; [3745-58-46(B)]
- 3. Is hazardous waste fuel stored in containers or tanks?
If so,
 - a. Is the storage for more than 90 days? [3745-58-45(C)] [3745-58-46(C) (D) (E)]
 - b. If 3.a. is yes, did the marketer/burner file a Part A Application for interim status as a storage facility by May 29, 1986?

Y
Y
Y
Y

NOTE: Storage of hazardous waste fuels in containers or tanks is subject to regulation under OAC 3745-52-34 and OAC 3745-65 through 3745-69. Complete applicable checklist(s) for G/TSD/containers/tanks.

MARKETER REQUIREMENTS (OAC 3745-58-45)

- 4. Have shipments of hazardous waste fuel initiated by the marketer been accompanied by completed manifests? [3745-58-45(D)]
- 5. Has the marketer obtained written notice before initiating the first shipment certifying that recipients of the hazardous waste fuel have notified US EPA of their hazardous waste activity and will burn hazardous waste fuel only in boilers or industrial furnaces? [3745-58-45(E), 3745-58-46(F)]

Y
Y

Y/N/NA RMK #

6. Has the marketer provided notice to companies from which he will receive hazardous waste fuel that he has notified US EPA of his hazardous waste activity? [3745-58-45(F)]

NA

Hickill
Markets to
Burner

7. Are copies of the required certifications maintained for 3 years by both the marketer and receiving burner? [3745-58-45(G)]

Y

8. Are other applicable recordkeeping requirements under OAC Chapters 3745-52, 3745-54, and 3745-65 maintained by the marketer?

Y

HAZARDOUS WASTE BURNER REQUIREMENTS (OAC 3745-58-46)

9. Is hazardous waste burned in appropriate devices as defined by 3745-58-42(B)?

NA

10. Did the burner provided a one-time written and signed notice to the marketer certifying that:

a. the burner has notified US EPA of its waste-as-fuel activities?

b. the burner will burn in a boiler or furnace identified in 3745-58-42(B)?

11. Are copies of required certification maintained for 3 years by both the marketer and receiving burner? [3745-58-46(G)]

12. Are other applicable recordkeeping requirements under OAC 3745-54 through 3745-57; 3745-65 through 3745-69; 3745-56-20 through 3745-56-59 and 3745-67-20 through 3745-67-58 maintained by the marker/burner?

✓

REMARKS - HAZARDOUS WASTE BURNER/MARKETER REQUIREMENTS

OAC 3745-53 HAZARDOUS WASTE TRANSPORTER REQUIREMENTS

REGISTRATION AND IDENTIFICATION REQUIREMENTS
(OAC 3745-53-11)

Y/N/NA RMK #

1. Has the entity registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste? [3745-53-11] Y _____
What is the entity's PUCO Number? 304-HW
2. Has the transporter received a US EPA ID number prior to transporting hazardous waste? [3745-53-11(D)] Y _____
3. Have all ^{hazardous} wastes accepted for transport by the transporter been accompanied by a manifest prepared by the generator in accordance with 3745-52? [3745-53-20(C)] Y _____
4. Has the transporter signed the manifest as required by 3745-53-20 and carried the manifest with the waste shipment as required by 3745-53-20(C)? Y _____
5. Upon delivery of the hazardous waste to the next transporter or the designated facility, has the transporter signed the manifest as required by 3745-53-20(D) (1) and retained a signed copy for at least 3 years? [3745-53-22(A)] Y _____
6. Has the transporter delivered the entire quantity of waste accepted from the generator in accordance with manifest instructions? Y _____
 - a. In cases where this was not possible, has the transporter contacted the generator for further instructions and revised the manifest accordingly? [3745-53-21(A) (B)] NA _____
7. If hazardous waste has been delivered to rail or water transporters, has the original transporter complied with the manifest handling requirements of 3745-53-20(E) (F)? NA _____
8. If hazardous waste has been shipped out of the country, has the transporter retained signed copies of the manifest for at least 3 years indicating that the waste left the U.S.A.? [3745-53-22(D)] NA _____

9. Has the transporter ever had a discharge of hazardous waste during the time that the waste was under his control? If so,

N _____

a. Was immediate action taken? [3745-53-30(A)]

NA _____

b. Were all of the notifications made as required by 3745-53-30(C)?

I _____

c. Was the discharge cleaned up as required by 3745-53-31?

↓ _____

10. Does the transporter store hazardous wastes temporarily while wastes are in transit? If so, are the following requirements met: [3745-53-12]

Y sometimes (used to)
1 see #1

a. Are wastes stored for only 10 days or less?

Y _____

b. Do wastes remain properly DOT packaged during storage?

Y _____

NOTE: Temporary storage in stationary tanks is not permitted under transfer facility requirements and such storage requires a RCRA permit and is subject to interim status requirements for storage facilities. Any type of storage by the transporter which is not specifically authorized under OAC 3745-53-12 transfer facility requirements is subject to full RCRA regulation.

11. Does the transporter import hazardous waste into the United States?

N _____

12. Does the transporter mix hazardous wastes of different US DOT descriptions by placing them into a single container?

N _____

NOTE: A transporter that imports hazardous wastes or mixes wastes as defined in 3745-53-10(c) becomes a generator and is subject to the requirements of 3745-52.

13. Does the transporter receive SQG wastes for transport pursuant to a reclamation agreement?

N _____

If so, was the following information recorded in a log or shipping paper carried with the shipment as required by 3745-53-20(H):

a. Name, address and US EPA ID # of SQG?

NA _____

b. Quantity of waste?

I _____

c. DOT required shipping information?

I _____

d. Date waste accepted?

↓ _____

Y/N/NA RMK #

14. If the transporter receives SQG wastes for transport as described in Question 13, are records related to the shipments maintained for at least 3 years following expiration of the reclamation agreement?
[OAC 3745-53-20 (H) (4)]

NA

REMARKS - TRANSPORTER REQUIREMENTS

- #1. If the transporter loaded the truck in the p.m. & could not transport the waste until the a.m., in a sense, the waste was being "stored".

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-991)

NOTE: Tanks used to store or treat wastes containing no free liquids (as determined by the Paint Filter Liquid Test) that are located inside a building with an impermeable floor are exempt from secondary containment requirements of 3745-66-93. Tank systems including sumps that serve as part of a secondary containment system are also exempt from 3745-66-93.

For generators who accumulate wastes in tanks for less than 90 days, compliance with the closure requirement of 3745-66-97(C) and the waste analysis requirement of 3745-66-991 is not required.

NEW TANK SYSTEM - Installation commencing after July 14, 1986. *

EXISTING TANK SYSTEM - Installation or operation commencing on or before July 14, 1986.

Y/N/NA RMK #

1. Is the generator operating any of the following classifications of tank systems for the management of hazardous waste(s):

- a. New tank system(s)? If so, Y

Did the o/o install secondary containment meeting the requirements of 3745-66-93 for the unit(s) prior to putting each into service? [3745-66-93 (A) (1)] Y

- b. Existing tank system(s) used to manage: F020, F021, F022, F023, F026 or F027 hazardous wastes? If so, N

Did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the tank by January 12, 1989? [3745-66-93 (A) (2)] NA

- c. Existing tank system(s) of known, documentable age? NA

- i. If so, has the tank reached 15 years of age?
(yes) _____ (no) _____

If the answer to 1.c.i. above is no, the tank is not required to have secondary containment until the unit reaches 15 years of age.

If the answer to 1.c.i. above is no, when is the unit required to have secondary containment?

If the answer to 1.c.i. above is yes, did the o/o provide secondary containment for the unit when it reached 15 years of age or; by January 12, 1989 (whichever came later)? [3745-66-93 (A) (3)]

- d. Existing tank system(s) for which the age cannot be documented? If so, NA

- i. Is the facility greater than 7 years of age?
(yes) _____ (no) _____

If the facility is < 7 years of age, secondary containment for the tank is not required until January 12, 1995.

- ii. If the facility is > 7 years of age, is the facility also > 15 years of age?

(yes) _____ (no) _____

If the answer to 1.d.ii above is no, the o/o is not required to provide secondary containment for the tank until the facility reaches 15 years of age.

If the answer to 1.d.ii above is no, when is the secondary containment required for the tank(s)?

If the answer to 1.d.ii. above is yes, did the o/o provide secondary containment for the tank when the facility reached 15 years of age or; by January 12, 1989 (whichever came later)? [3745-66-93(A) (4)] NA

2. Is the o/o operating a tank system which is used to manage a material that became a hazardous waste after January 12, 1987? If so, N

- a. Has the o/o provided secondary containment meeting the requirements of 3745-66-93 for the unit as required in questions 1.a. through 1.d.? (NOTE: The date the material became a hazardous waste must be used in place of January 12, 1989) [3745-66-93(A) (5)] _____

3. IF THE O/O HAS NOT PROVIDED SECONDARY CONTAINMENT FOR THE TANK SYSTEM(S): Has the owner/operator obtained a variance from secondary containment requirements of 3745-66-93 from the Director in accordance with 3745-66-93(G) (1)? X

Note: If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to page 9 of this Tank Systems Checklist.

4. Is the secondary containment provided for the tank system one of the following, as described in 3745-66-93:

a. External Liner? If so,

1. Is the liner designed or operated to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93 (E) (1) (a)]
2. Is the liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93 (E) (1) (b)]
3. Is the liner free of cracks and gaps? [3745-66-93 (E) (1) (c)]
4. Does the liner completely surround the tank and cover all earth likely to be contacted by waste during a release? [3745-66-93 (E) (1) (d)]
5. Are chemically resistant water stops in place at all joints? [3745-66-93 (E) (1) (e)]
6. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? [3745-66-93 (E) (1) (f)]

b. Vault System? If so,

1. Is the vault system designed to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93 (E) (2) (a)]
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93 (E) (2) (b)]
3. Are chemically resistant water stops in place at all joints? [3745-66-93 (E) (2) (c)]

4. Is there a compatible interior coating to prevent migration into the concrete? [3745-66-93(E) (2) (d)]
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent against the formation or ignition of vapors? [3745-66-93(E) (2) (e)]
6. Is the vault system provided with an exterior moisture barrier? [3745-66-93(E) (2) (f)]
- c. Doubled-Walled Tank? If so,
1. Is the doubled-walled tank designed as an integral structure to contain any release from the inner tank? [3745-66-93(E) (3) (a)]
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion? [3745-66-93(E) (3) (b)]
3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? [3745-66-93(E) (3) (c)]
5. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D) (4) which has been approved by the Director? [3745-66-93(D) (E)]

REMARKS - SECONDARY CONTAINMENT REQUIREMENTS

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION
(OAC 3745-66-93 (B) (C))

Y/N/NA RMK #

6. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93 (B)]
7. Does the secondary containment system meet the following minimum requirements of 3745-66-93 (C) :
- a. Is it constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93 (C) (1)]
- b. Is it placed on a foundation or base capable of providing support? [3745-66-93 (C) (2)]
- c. Is it provided with a leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93 (C) (3)]
- d. Is it sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93 (C) (4)]
- e. Is any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93 (C) (4)]

Y

Y

Y

Y

Y

Y

REMARKS - SECONDARY CONTAINMENT REQUIREMENTS

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))

Y/N/NA RMK #

8. Is tank system ancillary equipment provided with secondary containment such as double-walled piping, jacketing or trench? [3745-66-93(F)]

N _____

9. If the answer to #8 is NO, is ancillary equipment:

a. Inspected daily? AND;

Y. _____

b. Is ancillary equipment one of the following;

i. Above ground piping (exclusive of flanges, joints, valves and connections)?

Y _____

ii. Welded flanges, welded joints and/or welded connections?

N _____

iii. Sealless or magnetic coupling pumps and/or sealless valves?

NA _____

iv. Pressurized above ground piping systems with automatic shut-off devices (e.g. excess flow check valves, flow metering shutdown devices, and/or loss of pressure-actuated shut-off devices)?

N _____

REMARKS - ANCILLARY EQUIPMENT REQUIREMENTS

All "new" tank system piping is 2" diameter Schedule 40, carbon steel. Piping connections are either threaded couplings or unions.

Valves are either

- ① Threaded body globe
- ② gate
- ③ or ball

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

Y/N/NA RMK #

1. For new tank systems has the o/o obtained a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]

NA

Does the written assessment meet the following requirements of OAC 3745-66-92:

- a. Has the assessment been certified by an independent, registered, professional engineer? [3745-66-92(A)]
- b. Does the assessment include consideration of the design standards of the system? [3745-66-92(A)(1)]
- c. Does the assessment include consideration of the hazardous characteristics of the waste(s) to be handled? [3745-66-92(A)(2)]
- d. If the external system or components of the system are metal, does the assessment include a evaluation of the system by a corrosion expert to determine the potential of system corrosion? [3745-66-92(A)(3)]
- e. For underground tank components, does the written assessment include a determination of design and operational measures that will be needed to protect the tank system from potential damage? [3745-66-92(A)(4)]
- f. Does the assessment include design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A)(5)(a)]
- g. For tanks situated in a seismic fault zone or saturated zone, does the assessment include design considerations for anchoring the unit to prevent floatation? [3745-66-92(A)(5)(b)]
- h. Does the assessment include design considerations to ensure that the tank system will withstand the effects of frost heave? [3745-66-92(A)(5)(c)]

REMARKS - NEW TANK SYSTEM ASSESSMENT REQUIREMENTS

2. Does the o/o have on file at the facility, written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]

NA _____

IN ACCORDANCE WITH OAC 3745-66-92(G), do the written statements address all of the following:

- a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]
- b. A statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]?
- c. Proper backfilling? [3745-66-92(C)]
- d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)]
- e. Proper support and protection of ancillary equipment? [3745-66-92(E)]
- f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]

REMARKS - NEW TANK SYSTEM REQUIREMENTS

Y/N/NA RMK

- [illegible]

TANK SYSTEMS - 9 -

(5/29/92)
FINAL

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS
(OAC 3745-66-94)

Y/N/NA RMK #

1. Does the o/o follow the general operating requirements below: [3745-66-94]
 - a. Does the o/o prevent the placement of hazardous waste or treatment reagents in the tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)]
 - b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms)? [3745-66-94(B)]
 - c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)]

Y _____

Y _____

Y *rainwater in ditch. Not due to tank failure*

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

2. Has the o/o documented the inspections required in 3745-66-95, in the operating record of the facility, including inspection of the following:
 - a. Spill control equipment (daily)? [3745-66-95(A)(1)]
 - b. Above ground portion of tank (daily)? [3745-66-95(A)(2)]
 - c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)]
 - d. Construction materials and area immediately surrounding the tank for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)]
 - e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)]
 - f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)]

Y _____

Y _____

Y _____

Y _____

NA _____

NA _____

REMARKS - TANK SYSTEM GENERAL OPERATING AND INSPECTION REQUIREMENTS

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES
(OAC 3745-66-98 AND 3745-66-99)

Y/N/NA RMK #

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)]

a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A) (1)]

NA

OR;

b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A) (2)]

Y

OR;

c. The tank is used solely for emergencies? [3745-66-98(A) (3)]

N

2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA flammable or combustible code (1977 or 1981)? [3745-66-98(B)]

Y

3. Has the o/o placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material [3745-66-99]?

N

a. If so, have the requirements of 3745-65-17(B) been met?

NA

REMARKS - IGNITABLE/INCOMPATIBLE WASTE REQUIREMENTS

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS
(OAC 3745-66-991)

Y/N/NA RMK #

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991]

Wastestreams, general, are also the same.

- a. Conducted waste analysis and trial treatment storage tests? [3745-66-991(A)]

NA _____

OR;

- b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-991(B)]

NA _____

REMARKS - TANK SYSTEM WASTE ANALYSIS REQUIREMENTS

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE
(OAC 3745-66-96)

Y/N/NA RMK #

1. Has there been a leak or spill from any tank system or has any tank system been found unfit for use?

NA

If so, did the owner/operator:

- a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)]
- b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B) (1)]
- c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B) (2)]
- d. Immediately conduct a visual inspection of the release? [3745-66-96(C)]
- e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C) (1)]
- f. Properly dispose of any visible contamination of the soil or surface water? [3745-66-96(C) (2)]
- g. Report the release to the Director within 24 hours unless it was less than 1 lb. and was cleaned up immediately? [3745-66-96(D) (1) (2)]
- h. Submit a written report of the incident to the Director within 30 days of the release? [3745-66-96(D) (3)]
- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)]
- j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E) (4)]

NOTE: The requirements noted in 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

2. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from a registered, professional engineer attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)]
 - i. Was a copy of the certification submitted to the Director within seven days after returning the system to use? [3745-66-96(F)]
3. If the o/o was unable to repair and return the unit to service as described in 1.a. through 1.e., was the tank system closed in accordance with 3745-66-97? [3745-66-96(E) (1)]
4. Has the o/o of a tank system with a variance from secondary containment from which a release has occurred but has not migrated beyond the zone of engineering control complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G) (3)]
 - i. If soils cannot be removed, has the tank been closed? [3745-66-93(G) (3)]
5. Has the o/o of a tank system with a variance from secondary containment from which a release has occurred and has migrated from the zone of engineering control complied with 3745-66-96(A) through (D) and prevented migration and decontaminated soil? [3745-66-93(G) (4)]

NA	

REMARKS - TANK SYSTEMS FOUND LEAKING OR UNFIT FOR USE

RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST

RECEIVED
WMD RECORD CENTER

JUL 28 1994

Facility: Huhill Chemical Corp.
USEPA I.D.: OH D 001 926 740
Street: 7013 Knick Road
City: Bedford State: OH Zip: 44146
County: Cuyahoga Telephone: (216) 232-9400
Owner/Operator: Same
Street: _____
City: _____ State: _____ Zip: _____
Telephone: _____ Fax: _____
Inspection Date: 3 10 94 Time: 9:30am - 5:00pm
3 14 94
3 15 94
Advance notice of inspection given? (yes) _____ (no) ✓
If so, how far in advance? _____

	Name	Agency/Title	Phone
Inspectors:	<u>Melene Immanuelson</u>	<u>OEPA</u>	<u>(216) 963-1162</u>
	<u>Adrienne LaFavre</u>	<u> </u>	<u>(216) 963-1200</u>
	<u>Carolyn Pearson</u>	<u> </u>	<u> </u>
Facility Representative:	<u>Ed Price</u>	<u>Huhill Consultant</u>	<u>(216) 232-9400</u>
	<u>Mike May</u>	<u>Plant Manager</u>	<u>↓</u>

STATUS

Cond. Exempt SQG _____ SQG _____ Large Quantity Generator X
LDR Checklist Attached: (yes) X (no) _____

NOTE: LDR requirements are not applicable to CRSQGs.

ACTIVITIES

Containers <u>✓</u>	Used oil burner _____
Tanks <u>✓</u>	Hazardous waste fuel burner/blender <u>✓</u>
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

Revised: (5/29/92)
FINAL

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

* All the information can be found in Aukill's 1993 ES SUMMARY Generator Annual Report

ON SITE MANAGEMENT

OFF SITE MANAGEMENT

[illegible]

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) ✓

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) _____ (no) ✓

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

(yes) ✓ (no) _____

or;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) _____ (no) ✓

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A) (B) and (C)?

Y

by knowledge
of GC test of
solvents

(a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)]

N

Do not do
TCLP
Base TC
wastes with
on what the
generator
provides

NOTE: The TC rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, specify those waste streams which the generator has failed to adequately evaluate:

- Fuels blending wastes which are manifested off-site to Cement Kilns

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

N

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06(A)?

N

If so, please identify these waste streams below:

4. In accordance with OAC rule 3745-51-02(E), is the generator recycling any materials on-site by:
- Using or reusing the material as an ingredient in an industrial process to make a product?
 - If so, is the material being reclaimed before it is used or reused?
 - Using the material as a substitute for commercial products?
 - Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?
 - If so, is the material reclaimed before returning to the original process?

NA

NOTE: The materials identified in Question #4 may not be considered wastes if recycled as described above, unless the conditions identified in Questions 4(a)(i) or 4(c)(i) are true. See O.A.C. Rule 3745-51-02(E).

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?

✓

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

6. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from US EPA or Ohio EPA as required by 3745-52-12?

Y

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

7. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?

Y

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57
AND OAC 3745-52-60)

Y/N/NA RMK #

8. Does the generator import or export hazardous waste?

N _____

If so, are the wastes handled in accordance with the requirements of 3745-52-50 through 3745-52-57 and 3745-52-60?

NA _____

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

9. Does the generator meet the following pre-transport requirements prior to offering hazardous wastes for transport off-site:

- a. The waste material is packaged, labeled, and marked in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32(A)]?
- b. Each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32(B)?
- c. Before transporting hazardous wastes off-site or offering hazardous wastes for transportation off-site, does the generator placard or offer the appropriate DOT placards to the initial transporter in compliance with 3745-52-33?

Y _____

Y _____

Y #1

REMARKS - PRETRANSPORT REQUIREMENTS

#1 In suitcases for the drivers in their trucks and in the warehouse

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, US EPA form 8700-22 in compliance with 3745-52-20 (A)?
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)?
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
 - a. If not, has the generator complied with the manifest exception reporting requirements in 3745-52-42?

NOTE: The manifest exception reporting requirement identified in Question #2 above is applicable to large quantity generators only. See Question #3 for manifest exception reporting requirements for small quantity generators.

3. If the generator is acting as a small quantity generator, (> 100 kg but < 1000 kg of hazardous waste in a calendar month) has the generator received a return copy of each completed manifest within sixty days of receipt by the initial transporter? [3745-52-42 (B)]
 - a. If not, did the generator submit a legible copy of the manifest with some indication that the generator has not received confirmation of delivery to the Ohio EPA? [3745-52-42 (B)]
4. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?

Y

N #1

Y

Y

Y

NA

NA

NA

Y

1 Facility received waste from Letterkenny Army Depot, internal manifest number 17668 (Capital) listed waste codes were as follows, D001, D007, D008, D013, D043, D035. Waste shipped offsite by Hubbell as their generator waste, manifest 30254, was missing the D043. During inspection, EPA was told that this was the manifest. (5/29/92) FINAL

MANIFEST -1-

GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

NA

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34(A) (1)]

NA

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

3. If the < 90 day unit closed was a tank system, did the generator also complete closure in accordance with the tank system closure requirements of 3745-66-97(A) and (B)? [3745-52-34(A) (1)]

NA

REMARKS - GENERATOR CLOSURE REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the generator provide a personnel training program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34 (A) (4)]
2. Does the generator provide personnel training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34 (A) (4)]
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34 (A) (4)]
4. Does the generator keep all the records required by 3745-65-16(D) (E) including; written job titles, job descriptions and documented employee training records? [3745-52-34 (A) (4)]

Y

Y

Y

Y

REMARKS - PERSONNEL TRAINING REQUIREMENTS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

In part B permit app. Revision 5 1/92

Y/N/NA RMK #

1. Does the o/o have a written contingency plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52 (A) (B) (C) (D) (E)]
 - a. Actions to be taken by personnel in the event of an emergency?
 - b. Arrangements or agreements with local or state emergency authorities?
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?
 - d. A list of all emergency equipment including location, physical description and outline of capabilities?
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52 (F)]?
2. Is the contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51 (A)]
3. Is a copy of the contingency plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53 (A) (B)]
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54]
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the contingency plan designated at all times (on-site or on-call)? [3745-65-55]
6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the contingency plan and taken all of the actions and made all of the notifications necessary under 3745-65-56 (A-J)?

Y	
Y	
Y	
Y	
Y	
Y	
Y	
Y	
Y	
NA	No emergency since last inspection

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

2 drums in process of
last warehouse were
leaking

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (leaking pumps)

N _____

2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?

N _____

a. If yes, was the contingency plan implemented? [3745-65-51(B)]

NA _____

NOTE: Small quantity generators are not required to maintain a contingency plan. Question #2(a) is, therefore, not applicable to SQGs.

3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]

a. Internal alarm system?

Y _____

b. Access to telephone, explosion proof by drum dumper radio or other device for summoning emergency assistance?

Y _____

c. Portable fire control equipment, spill control and decontamination equipment?

Y _____

d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?

Y _____

4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]

Y _____

a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, name of person conducting the test, observations made, and date and nature of any repairs?

Y _____

5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]

Y _____

6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]

N * _____

* Drums being stored in the unpermitted area did not have adequate aisle space between them

Y/N/NA RMK #

7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]
8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [3745-65-37(B)]

Y

NA

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

- a. The containers or tanks are clearly marked with the words "Hazardous Waste?" [3745-52-34(A)(3)]
- b. The date that accumulation began is clearly marked on each container? [3745-52-34(A)(2)]

Y

Y

In addition, OAC 3745-52-34(A)(1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks?

Y

If so, OAC 3745-52-34(A)(1) requires generators to comply with rules 3745-66-90 to 3745-66-992 except paragraph (C) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Tank System Requirements checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days?

N

- a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days?

NA

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

1. Are hazardous wastes stored in containers which are:
 - a. Closed? [3745-66-73(A)]
 - b. In good condition? [3745-66-71]
 - c. Compatible with wastes stored in them? [3745-66-72]
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)]
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)]
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:
 - a. Date and time of inspections?
 - b. Name of inspector?
 - c. Notation of observations made during the inspection?
 - d. The date and nature of any repairs or other remedial action?
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,
 - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]
 - b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]

Y Y Y Y Y

not
dun
been

Y Y Y Y Y

NOTE: Small Quantity Generators are not required to comply with OAC Rule 3745-66-67 (except for wastes being accumulated in satellite accumulation areas). [See OAC Rules 3745-52-34(D)(2) and (C)(1)(a)]

Concern: Inspection logs need to be updated.

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

Y _____

If so, are the following requirements of OAC 3745-52-34(C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
- b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
- c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

Y _____

NA _____

Y _____

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

N _____

- a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and;

NA _____

- b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

Y _____

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

Concern: Satellite Accum outside of the maintenance shop.
Need a log of where these areas are located